S. Hrg. 101-30, Pt. 3

TONGASS NATIONAL FOREST

HEARING

BEFORE THE

SUBCOMMITTEE ON
PUBLIC LANDS, NATIONAL PARKS AND FORESTS

OF THE

COMMITTEE ON
ENERGY AND NATURAL RESOURCES
UNITED STATES SENATE

ONE HUNDRED FIRST CONGRESS

SECOND SESSION

ON

H.R. 987

TO AMEND THE ALASKA NATIONAL INTEREST LANDS CONSERVATION ACT, TO DESIGNATE CERTAIN LANDS IN THE TONGASS NATIONAL FOREST AS WILDERNESS, AND FOR OTHER PURPOSES

FEBRUARY 26, 1990

PART 3

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TONGASS NATIONAL FOREST

MONDAY, FEBRUARY 26, 1990

U.S. Senate,
Subcommittee on Public Lands,
National Parks and Forests,
Committee on Energy and Natural Resources,
Washington, DC.

The subcommittee met, pursuant to notice, at 2 p.m. in room SD-366, Dirksen Senate Office Building, Hon. J. Bennett Johnston, chairman, presiding.

OPENING STATEMENT OF HON. J. BENNETT JOHNSTON, U.S. SENATOR FROM LOUISIANA

The Chairman. The hearing will come to order.

In 1980 the Alaska National Interest Lands Conservation Act, or ANILCA, was enacted. As Congress designated 5.6 million acres of the Tongass National Forest as wilderness, it also determined that the Tongass National Forest would be managed under a number of special provisions which set it apart from other national forests.

In addition to the two long-term contracts already in place at the time of ANILCA's passage, Congress guaranteed a decadal harvest level of 4.5 billion board-feet on the Tongass, mandated a direct appropriation of at least $40 million, and allowed the Tongass an exemption from the timber suitability analysis required by the National Forest Management Act.

Over the last few years many in and out of Congress have taken a hard look at those decisions we made almost ten years ago and ask a basic question: Have the assurances we made in 1980 unduly biased the management of the Tongass in favor of timber production at the expense of other values? Or are these provisions appropriate compensation for the large wilderness set-asides of 1980?

In this Congress alone, three measures have been introduced, each of which takes a different approach to responding to that question.

Today we intend to focus on two provisions of one of those measures, H.R. 987, the House-passed Tongass reform legislation, which has not been directly addressed at previous subcommittee hearings. Specifically, we will take testimony on those portions of H.R. 987 relating to fisheries protection and buffer zones and those provisions relating to the designation of additional wilderness areas in the Tongass National Forest.

It is my sincere hope that this will be the last of our hearings regarding the Tongass National Forest and that we can move quickly to resolve this issue. Over the last couple of years, I have spoken with a wide variety of Southeast Alaskans concerning the

Tongass, including timber company representatives, environmentalists, mill workers, and many, many others.

While these individuals might propose dramatically different solutions to the Tongass issue, they almost all agree that what is needed most in Southeast Alaska is certainty.

With that in mind, I am committed to a speedy markup and floor action for Tongass legislation, in hopes of getting to conference with the House and resolving these issues once and for all.

I would like to welcome all of the witnesses who will appear before us today, particularly those who have made the long trip from Alaska. I look forward to your testimony and, as staff I am sure has asked each of you, we would like to hold the testimony to five minutes, summarizing your written statement. Your written statement will of course be put in the record. And with that, we should have time for questions. I want to urge you all to respect the 5-minute limit.

At this time I will place a copy of H.R. 987 in the hearing record.

[The text of H.R. 987 follows:]

II

101st CONGRESS
1st Session

H.R. 987

IN THE SENATE OF THE UNITED STATES

July 17 (legislative day, January 3), 1989

Received; read twice and referred to the Committee on Energy and Natural Resources

AN ACT

To amend the Alaska National Interest Lands Conservation Act, to designate certain lands in the Tongass National Forest as wilderness, and for other purposes.

Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled,

SECTION 1. SHORT TITLE AND DEFINITION.

(a) Short Title.—This Act may be cited as the "Tongass Timber Reform Act".

(b) Definition.—As used in this Act, the term "the Act" means the Alaska National Interest Lands Conservation Act (Public Law 96–487).

TITLE I—ALASKA NATIONAL INTEREST LANDS CONSERVATION ACT AMENDMENTS

SEC. 101. TO REQUIRE ANNUAL APPROPRIATIONS FOR TIMBER MANAGEMENT AND RESOURCE CONSERVATION ON THE TONGASS NATIONAL FOREST.

(a) Section 705(a) of the Act (16 U.S.C. 539d(a)) is repealed effective October 1, 1989.

SEC. 102. IDENTIFICATION OF LANDS UNSUITABLE FOR TIMBER PRODUCTION.

Section 705(d) of the Act (16 U.S.C. 539d(d)) is hereby repealed.

SEC. 103. FUTURE REPORTS ON THE TONGASS NATIONAL FOREST.

(a) MONITORING.—Section 706(a) of the Act (16 U.S.C. 539e(a)) is amended—

(1) by striking "the Committee on Interior and Insular Affairs" and inserting "the Committee on Agriculture and the Committee on Interior and Insular Affairs"; and

(2) by striking the second sentence and inserting the following new sentence: "This report shall include a complete analysis of the losses or gains sustained by the United States Government with respect to long-

term, short-term and total sales of timber from the Tongass National Forest using information from the statement on revenues and expenses of the Timber Sale Program Information Reporting System and shall display total costs, unit costs (per thousand board feet of timber sold or released) and associated revenues, for the current and previous two years of operations.".

(b) STATUS.—Section 706(b) of the Act (16 U.S.C. 539e(b)) is amended as follows:

(1) Strike out "and (4)" and insert in lieu thereof "(4)".

(2) Strike the period at the end of the section and insert ", (5) the impact of timber management on subsistence resources, wildlife, and fisheries habitats, and (6) the steps taken by the Secretary of Agriculture under section 401(c) of the Tongass Timber Reform Act.".

(c) CONSULTATION.—Section 706(c) of the Act (16 U.S.C. 539e(c)) is amended by striking out "and the Alaska Land Use Council" and inserting in lieu thereof "the southeast Alaska commercial fishing industry, and the Alaska Land Use Council".

SEC. 104. ADMINISTRATION.

Section 705 (16 U.S.C. 539d) of the Act is amended by adding at the end thereof the following:

"(e) FISHERIES PROTECTION.—In order to assure protection of riparian habitat, the Secretary of Agriculture shall maintain a buffer zone of a minimum of 100 feet in width within which logging shall be prohibited on each side of all anadromous fish streams in the Tongass National Forest, and their tributaries, except those tributaries with no resident fish populations which are intermittent in flow, or have flow of inadequate magnitude to directly influence downstream fish habitat.

"(f) TENAKEE SPRINGS ROAD PROHIBITION.—A vehicular access road connecting the Indian River and Game Creek roads may not be constructed, and the Secretary of Agriculture shall not engage in any further efforts to connect the city of Tenakee Springs with the logging road system on Chichagof Island.".

TITLE II—TERMINATION OF LONG-TERM TIMBER SALE CONTRACTS IN ALASKA

SEC. 201. TERMINATION.

Title V of the Act is amended by adding at the end thereof the following new section:

"SEC. 508. TERMINATION OF LONG-TERM TIMBER SALE CONTRACTS IN ALASKA.

"(a) FINDING.—The Congress hereby finds and declares that it is in the national interest to assure that valuable public resources in the Tongass National Forest are protected and wisely managed. Termination of the long-term timber sale contracts is necessary because the contracts prevent proper Forest Service management, allow the holders to concentrate logging in the rare, high-volume old growth forest most valuable for fish and wildlife habitat, threaten natural resource dependent communities and industries, and undermine competition within the southeast Alaska timber industry.

"(b) TERMINATION OF LONG-TERM TIMBER SALE CONTRACTS.—Not later than 90 days after the date of enactment of this section, the Secretary of Agriculture shall terminate the long-term timber sale contracts numbered 12-11-010-1545 and A10fs-1042 between the United States and Alaska Pulp Corporation, and between the United States and Ketchikan Pulp Company, respectively.

"(c) SUBSTITUTION OF SHORT-TERM TIMBER SALES.—The Secretary of Agriculture is authorized to make available sufficient volumes of timber to meet actual market demand as determined pursuant to planning process specified in section 6 of the Forest and Rangeland Renewable Resource Planning Act of 1974 and other applicable laws. Timber sales shall be offered for competitive bid and administered consistent with standard, short-term timber sales on other national forests.".

TITLE III—WILDERNESS

SEC. 301. ADDITIONAL WILDERNESS AREAS.

(a) DESIGNATION.—Section 703 of the Act is amended by adding at the end thereof the following:

"(c) DESIGNATION OF ADDITIONAL WILDERNESS ON THE TONGASS NATIONAL FOREST.—In furtherance of the purposes of the Wilderness Act (16 U.S.C. 1131-1136), the following lands within the Tongass National Forest in the State of Alaska are hereby designated as wilderness and therefore as components of the National Wilderness Preservation System:

"(1) ANAN CREEK WILDERNESS.—Certain lands which comprise approximately 38,415 acres, as generally depicted on a map entitled 'Anan Creek Wilderness—Proposed' and dated May, 1989, which shall be known as the Anan Creek Wilderness.

"(2) BERNERS BAY WILDERNESS.—Certain lands which comprise approximately 46,135 acres, as generally depicted on a map entitled 'Berners Bay Wilderness—Proposed' and dated May, 1989, which shall be known as the Berners Bay Wilderness.

"(3) CALDER-HOLBROOK WILDERNESS.—Certain lands which comprise approximately 68,693 acres, as generally depicted on a map entitled 'Calder-Holbrook

Wilderness—Proposed' and dated May, 1989, which shall be known as the Calder-Holbrook Wilderness.

"(4) CHICHAGOF WILDERNESS.—Certain lands which comprise approximately 347,733 acres, as generally depicted on a map entitled 'Chichagof Wilderness—Proposed' and dated May, 1989, which shall be known as the Chichagof Wilderness.

"(5) CHUCK RIVER WILDERNESS.—Certain lands which comprise approximately 124,539 acres, as generally depicted on a map entitled 'Chuck River Wilderness—Proposed' and dated May, 1989, which shall be known as the Chuck River Wilderness.

"(6) KADASHAN WILDERNESS.—Certain lands which comprise approximately 34,044 acres, as generally depicted on a map entitled 'Kadashan Wilderness—Proposed' and dated May, 1989, which shall be known as the Kadashan Wilderness.

"(7) KARTA RIVER WILDERNESS.—Certain lands which comprise approximately 39,886 acres, as generally depicted on a map entitled 'Karta River Wilderness—Proposed' and dated May, 1989, which shall be known as the Karta River Wilderness.

"(8) KEGAN LAKE WILDERNESS.—Certain lands which comprise approximately 24,655 acres, as generally depicted on a map entitled 'Kegan Lake Wilderness—Proposed' and dated May, 1989, which shall be known as the Kegan Lake Wilderness.

"(9) NAHA RIVER WILDERNESS.—Certain lands which comprise approximately 31,794 acres, as generally depicted on a map entitled 'Naha River Wilderness—Proposed' and dated May, 1989, which shall be known as the Naha River Wilderness.

"(10) NUTKWA WILDERNESS.—Certain lands which comprise approximately 52,654 acres, as generally depicted on a map entitled 'Nutkwa Wilderness—Proposed' and dated May, 1989, which shall be known as the Nutkwa Wilderness.

"(11) OUTSIDE ISLANDS WILDERNESS.—Certain lands which comprise approximately 98,572 acres, as generally depicted on a map entitled 'Outside Islands Wilderness—Proposed' and dated May, 1989, which shall be known as the Outside Islands Wilderness.

"(12) PLEASANT-LEMESURIER-INIAN ISLANDS WILDERNESS.—Certain lands which comprise approximately 23,140 acres, as generally depicted on a map entitled Pleasant-Lemesurier-Inian Islands Wilderness—Proposed' and dated May, 1989, which shall be known as the Pleasant-Lemesurier-Inian Islands Wilderness.

"(13) POINT ADOLPHUS-MUD BAY WILDERNESS.—Certain lands which comprise approximately 73,346 acres, as generally depicted on a map entitled 'Point Adolphus-Mud Bay Wilderness—Proposed' and dated May, 1989, which shall be known as the Point Adolphus-Mud Bay Wilderness.

"(14) PORT HOUGHTON-SANBORN CANAL WILDERNESS.—Certain lands which comprise approximately 58,915 acres, as generally depicted on a map entitled 'Port Houghton-Sanborn Canal Wilderness—Proposed' and dated May, 1989, which shall be known as the Port Houghton-Sanborn Canal Wilderness.

"(15) ROCKY PASS WILDERNESS.—Certain lands which comprise approximately 75,734 acres, as generally depicted on a map entitled 'Rocky Pass Wilderness—Proposed' and dated May, 1989, which shall be known as the Rocky Pass Wilderness.

"(16) SARKAR LAKES WILDERNESS.—Certain lands which comprise approximately 25,650 acres, as generally depicted on a map entitled 'Sarkar Lakes Wilderness—Proposed' and dated May, 1989, which shall be known as the Sarkar Lakes Wilderness.

"(17) SOUTH ETOLIN ISLAND WILDERNESS.—Certain lands which comprise approximately 83,642 acres, as generally depicted on a map entitled 'South

Etolin Island Wilderness—Proposed' and dated May, 1989, which shall be known as the South Etolin Island Wilderness.

"(18) SOUTH KUIU WILDERNESS.—Certain lands which comprise approximately 191,532 acres, as generally depicted on a map entitled 'South Kuiu Wilderness—Proposed' and dated May, 1989, which shall be known as the South Kuiu Wilderness.

"(19) SULLIVAN ISLAND WILDERNESS.—Certain lands which comprise approximately 4,032 acres, as generally depicted on a map entitled 'Sullivan Island Wilderness—Proposed' and dated May, 1989, which shall be known as the Sullivan Island Wilderness.

"(20) TRAP BAY WILDERNESS.—Certain lands which comprise approximately 6,667 acres, as generally depicted on a map entitled 'Trap Bay Wilderness—Proposed' and dated May, 1989, which shall be known as the Trap Bay Wilderness.

"(21) WEST DUNCAN CANAL WILDERNESS.—Certain lands which comprise approximately 134,627 acres, as generally depicted on a map entitled 'West Duncan Canal Wilderness—Proposed' and dated May, 1989, which shall be known as the West Duncan Canal Wilderness.

"(22) YAKUTAT FORELANDS WILDERNESS.—Certain lands which comprise approximately 220,268 acres, as generally depicted on a map entitled 'Yakutat Forelands Wilderness—Proposed' and dated May, 1989, which shall be known as the Yakutat Forelands Wilderness.

"(23) YOUNG LAKE WILDERNESS ADDITION TO ADMIRALTY ISLAND NATIONAL MONUMENT.—Certain lands which comprise approximately 18,702 acres, as generally depicted on a map entitled 'Young Lake Wilderness—Proposed' and dated May, 1989, which shall be managed as an addition to the Admiralty Island National Monument.

"(d) APPLICATION OF SECTION 1315(e).—Section 1315(e) of this Act (16 U.S.C. 3203(e)) shall not apply to the wilderness designated by subsection (c).".

(b) ADMINISTRATION.—Section 707 of the Act is amended by adding the following at the end thereof: "Subject to valid existing rights, the wilderness areas designated in amendments made to section 703(c) of this Act by the Tongass Timber Reform Act shall be administered by the Secretary of Agriculture in accordance with this section, except that, in the case of such areas, any reference in the provisions of the Wilderness Act to the effective date of the Wilderness Act (or any similar reference) shall be deemed to be a reference to the date of enactment of the Tongass Timber Reform Act.

TITLE IV—IMPROVEMENT OF THE MANAGEMENT OF THE TONGASS NATIONAL FOREST

SEC. 401. MANAGEMENT OF THE TONGASS NATIONAL FOREST.

(a) FINDINGS.—The Congress finds that—

(1) the commercial fishing, recreation, timber, and tourism industries each make a substantial contribution to the economy of southeast Alaska and their ability to contribute in the future depends upon balanced planning and management of the Tongass National Forest; and

(2) the Secretary of Agriculture should plan and manage the Tongass National Forest in a manner that adequately protects and enhances fish, wildlife, and recreation resources, as well as timber, and should act in the long-term best interests of all natural resources dependent industries and subsistence communities in southeast Alaska.

(b) PURPOSES.—The purposes of this section are to require the Secretary of Agriculture to—

(1) assess the extent to which planning and management of the Tongass National Forest prior to the

enactment of this Act has differed from planning for, and management of, other national forests; and

(2) change, in conformance with laws applicable to the National Forest System, planning and management priorities regarding the Tongass National Forest so as to assure that greater emphasis is given to the long-term best interests of the commercial fishing, recreation, and tourism industries, subsistence communities in southeast Alaska, and the national interest in the fish and wildlife and other natural resources of the Tongass National Forest.

(c) DIRECTIVE.—The Secretary of Agriculture is authorized and directed to take such steps as are necessary in current management practices and in revisions of the Tongass land management plan to achieve the purposes described in subsection (b).

(d) OLD-GROWTH FOREST MANAGEMENT.—In developing the land management plan for the Tongass National Forest pursuant to section 6 of the Forest and Rangeland Renewable Resources Planning Act of 1974, the Secretary shall—

(1) provide for sustained production of old-growth forest resources within the Tongass National Forest; and

(2) upon completion of the draft of such plan, which shall be completed in any event not later than one year after the date of enactment of this Act, report to the Committees on Agriculture and on Interior and Insular Affairs of the House of Representatives and the Committee on Agriculture, Nutrition, and Forestry of the Senate on provisions incorporated into such plan to meet the objective set forth in paragraph (1). The report shall include—

(A) the definition of the term "old-growth forest" used for purposes of such plan;

(B) the quantity and distribution of old-growth forest in the Tongass National Forest;

(C) the management objectives and guidelines incorporated into such plan to provide for sustained production of old-growth forest resources;

(D) the criteria used to determine how to integrate old-growth forest management objectives into the plan; and

(E) the relationship between old-growth forest management objectives and other resource management goals affecting timber, fish and wildlife, water quality, recreation, subsistence uses, and aesthetics.

Passed the House of Representatives July 13, 1989.

Attest: DONNALD K. ANDERSON,

Clerk.

The **Chairman**. Before we hear from our first witness, I would like to call on Senator Murkowski for such comments as he would like to make at this time.

Senator **Murkowski**. Thank you, Mr. Chairman. I wonder if I might defer to the senior Senator from Alaska.

The **Chairman**. Absolutely.

Senator **Murkowski**. A former member of this committee, and then if I might be called on very briefly.

Senator **Stevens**. It is a matter of age, Mr. Chairman.

The **Chairman**. I know about that. We are glad to welcome you.

STATEMENT OF HON. TED STEVENS, U.S. SENATOR FROM ALASKA

Senator **Stevens**. I want to thank you for holding this hearing. Being back in this room brings back memories of many days and many hours that we have spent here in this committee on the same subject. And I know there is no one who has been as faithful as you have in terms of traveling to Alaska and talking to our people and viewing the problems first-hand.

So we are grateful to you for the time you have spent and for the opportunity here for Alaskans to come once again to present their views on the future of the Tongass. I understand the Forest Service to be here, too.

I have another meeting going on. I appreciate your courtesy in allowing me to be here.

The **Chairman**. Thank you very much, Senator Stevens.

Senator Murkowski.

STATEMENT OF HON. FRANK H. MURKOWSKI, U.S. SENATOR FROM ALASKA

Senator **Murkowski**. Thank you, Mr. Chairman. My comments will be relatively brief in comparison to my ordinary comments. I want to put you at ease.

I want to thank you for scheduling these hearings, as-you know, Mr. Chairman, hearings on the two particular provisions of the House Tongass wilderness bill. The subject matters before us are wilderness designations and buffer strips. And the buffer strips, for those of you who are not aware, imply that no-logging zones would be on either side of the rivers and streams necessary to protect the fisheries.

The hearings will be the only Senate record on the impact of wilderness. There still have not been field hearings in Alaska on the impact of wilderness.

Further, Mr. Chairman, this hearing will be the only record in the Congress on buffer strips. As such, the testimony is critically important today.

As you and I both know, the Tongass has been a critical issue and a controversial one. Much of the controversy, however, has resulted in two great myths that have been perpetuated by opponents of logging. And those two are: first, that the Tongass timber program is a waste of the taxpayers' money; and second, that the entire Tongass is in danger of being clearcut.

I call these great myths because they bear no relationship whatsoever to reality, and I and my colleagues are a little bit tired of the inaccuracies being repeated over and over with regard to those two points.

The facts on the economic issue: it's true that the Tongass timber program when it was set up in 1980, included an automatic appropriation of at least $40 million. But our bill, S. 237, repeals that fund.

Opponents of logging also conveniently forget that the $40 million was a quid pro quo for preserving the 5.4 million acres of the Tongass as wilderness. My colleague Senator Stevens recalls that agreement: 1.6 million acres of that was taken out of the commercial timber base in 1980 and put into wilderness. So clearly, it was the price of wilderness.

It is also true that direct return to the treasury in the mid-1980's was less than what the government spent. But the Tongass is not unique. Virtually every other national forest lost money because of disastrous global timber markets at that time. Available for you, Mr. Chairman, and others, we have exhibits to document that fact.

Opponents of logging fail to acknowledge, one, that the contracts have been renegotiated, the sale price of timber reflects current high market prices; and further, that the Tongass now is one of the nation's most profitable forests, returning $1.41 for every dollar spent in 1989.

The bottom line, therefore, is that there is no economic problem with the Tongass. The myth is perpetuated by those whose objective is to stop logging and turn Tongass into nothing but a wilderness area.

Another myth, Mr. Chairman, is that the Tongass is in danger of being clearcut. Well, to get an idea of how outrageous this myth is, I ask my colleagues to refer to the map. It's a Forest Service map that was recently done. Tom Roberts of my staff will point it out.

Now, Mr. Chairman, I do not think you can see the little dark green dots, but these are all the areas which have been logged over the last four years. I am not talking about the light green, but if you get up there real close you can see tiny little green dots.

I would ask, Mr. Chairman, perhaps later if you could walk over and take a peek at it, because I cannot see them here, and I know Ted Stevens cannot see them either. [Laughter.]

Senator MURKOWSKI. But they are there.

Now, you can see the dark blue. That shows you how much wilderness is already there. You cannot see the areas that have been logged, but you can see the wilderness and the other areas where logging is prohibited.

The red and the orange indicate areas where logging is prohibited.

To put it in perspective, Mr. Chairman, only one-tenth of the 17 million acre forest will ever be harvested in perpetuity. But we want to confine our comparisons to only commercial timber areas. We see that one-third is in wilderness, 1.6 million acres; one-third is otherwise off-limits to logging. That equals two million acres. The remaining one-third is to be logged, or 1.7 million acres.

So Mr. Chairman, the Tongass is clearly not in danger of being clearcut.

The Tongass is the largest national forest in the country. Yet, current plans are to cut less than 450 million board-feet a year. Sometimes people have a difficult time assimilating what that means in comparison.

It compares to 1.5 billion board-feet that's cut in New York each year for firewood. 8 to 10 billion board-feet are cut each year in the Pacific Northwest. Nearly 4 billion board-feet are cut in Louisiana each year. And we are talking about a cut of 450 million board-feet to maintain our industry.

Lastly, Mr. Chairman, I would like to draw your attention to the realization of the Tongass land management plan that will be completed by the Forest Service we anticipate some time in June. That map was part of that preparation. There have been 30 hearings held in Alaska and approximately $5 million of taxpayers' funds expended on that process.

I would urge my colleagues to consider the merits of the recommendations in that report.

Finally, Mr. Chairman, I would like entered into the record a rather extensive statement covering in detail the points that I have highlighted here, as well as reference to some specific identifications with regard to the salmon catch in Alaska over the last decade, and specific revisions with regard to wilderness areas in comparison to the rest of the Tongass National Forest.

I think the staff will find them of interest and significantly enlightening to have one better understand the merits of the delineations that have already been determined with regard to the Tongass National Forest.

And also, there are eight States which are currently returning below cost estimates to the Federal Government, as well as documentation from the Wilderness Society as to the state of wilderness in the United States.

[The prepared statement of Senator Murkowski follows:]

SENATOR FRANK H. MURKOWSKI
U. S. SENATE ENERGY AND NATURAL RESOURCES COMMITTEE
FEBRUARY 26, 1990

Mr. Chairman, thank you for holding this hearing today so that Alaskans and the Administration can present their views on the Tongass wilderness legislation now before this Committee. It is a rarity that this Committee hold hearings on a wilderness bill which is opposed by an entire Congressional delegation -- myself, Sen. Ted Stevens and Congressman Don Young -- and the state's Governor. Not only is this wilderness legislation unpopular from Alaska's perspective, but it is based upon many false premises. Quite simply, the Tongass National Forest is not in danger of being clearcut and the administration of the timber program is not losing money.

Only ten percent of the Tongass forest will ever be harvested and this ten percent is harvested on a sustained yield basis over a one hundred year rotation. This ten percent of the forest contains only one-third of the high volume old growth timber stands over which there is increasing public concern. The Tongass has led the way in old growth forest protection when compared with other regions of the country. Two-thirds of our old-growth timber resources have already been dedicated exclusively to wilderness and fish and wildlife habitat. Not to mention fisheries enhancement work such as the construction of fish ladders and the seeding of lakes. Current Forest Service fisheries enhancement work has the potential to bring an additional eight to ten million pounds of salmon into fishermen's nets each year.

In 1989, the Forest Service paid the State of Alaska over $5 million out of timber receipts for schools and roads and still returned over $1 million to the treasury. In fact every $1.00 spent out of the annual $40 million appropriation on the timber program in the Tongass generated $1.41 in revenue. That's a forty-one percent return on the Government's investment. You don't have to be a former banker like I am to realize that a forty-one percent return on investment is a pretty good deal. No matter how you look at it, administration of the Tongass in 1989 did not result in a "tax payer rip off" as many falsely contend. This is why the Tongass is not on the list of "below cost" forests included in the President's budget. Eight states, including Colorado, have forests which lose money on their timber sales program. I would like to see those who target Alaska for easy environmental votes do a little more to make their own forests more productive.

If this were the first wilderness bill for the Tongass National Forest it might be appropriate for Congress to consider it, even in the face of opposition from those representing the people of Alaska. But it is not the first Tongass wilderness bill. The first Tongass wilderness bill, designating 5.4 million acres and locking away one-third of the timber base, was signed into law in 1980. It was assumed that a deal was a deal, and the contract was binding on both sides. Such was not the case. The purpose of our fight now is to maintain the viability of Alaska communities whose lifeblood is the resources produced on public lands. The legislation before us today is nothing more than an attempt to pull the federal rug out from under Southeast Alaskans.

Three legislative measures addressing management of the Tongass forest are before the Senate Energy and Natural Resources Committee at this time. My bill repeals ANILCA Section 705 eliminating the $40 million direct-appropriation for the Tongass timber supply fund and the requirement that the Forest Service supply 4.5 billion board feet of timber per decade to the dependent industry. My bill attempts to maintain a viable industry by directing the Forest Service to keep enough land in multiple use so that it could provide 4.5 billion board feet to the industry in a ten year period if the industry should require it. The amount of timber actually sold and cut each year would be determined by the appropriations process and demand, the same as on any other national forest.

Senator Wirth's bill is designed, in my opinion, to seriously cripple the timber industry in my State. His bill, S 346, repeals section 705 of ANILCA reneging on an agreement crafted by this Committee in 1980, mandates termination of two 50 year timber contracts which are vital to the economy of Southeast Alaska and puts 1.8 million acres of additional valuable forest lands off-limits to multiple use management. His bill does nothing to maintain the viability of the timber industry. Should this measure become law, it would reduce the sustained yield of the Tongass forest by more than half and abrogate contracts resulting in a potential liability to the United States running into the hundreds of millions of dollars. Not to mention the United States walking away from a commitment made to the people of Southeast Alaska -- a commitment that families, businesses and communities have relied upon for 40 years.

The Tongass wilderness bill passed by the House (H.R. 987) goes further to drive the timber industry out of Southeast Alaska. This bill designates 1.8 million acres of wilderness in 23 areas which are, in many cases, areas critical to the viability of local logging communities. Wilderness will also preclude mining and the development of many critical transportation and utility corridors -- freezing the community development of Southeast Alaska. Much of the mineral potential of Southeast Alaska has not been discovered. Much exploration work needs to be done. Virtually all of the communities in Southeast Alaska lie isolated within the Tongass National Forest. The elimination of transportation and utility links between communities will have a devastating effect on the quality of life in these communities in the future.

The House bill also hides behind a legitimate concern about the viability of fisheries resources and attempts a new kind of land grab -- "buffer strips". Mandating a one hundred foot no cut zone along side a stream bank to protect fish habitat does not sound like to much to ask, and I support this. In fact, this is exactly what the Forest Service does and more on a site specific basis right now. But this is not what the House buffer strip provision is about. The provision in the House bill requires a latticework of 200 foot no cut zones following every river, stream, and smallest creek in the forest regardless of whether there are fish affected. In Southeast Alaska, where the slopes are often steep and it rains up to 200 inches a year we have a lot of small streams and creeks. Many with no resident or anadromous fish and no impact on fish habitat.

The 1978 Tongass National Forest plan balanced wilderness, fish and wildlife habitat protection and multiple use. The Forest Service found that the Tongass forest could produce over 10 billion board feet of timber each decade on a sustained yield basis. However, the 1978 Forest Plan recommended a sustained yield harvest of only 4.5 billion board feet per decade reserving over half of the forest for other uses not directly compatible with timber management, including wilderness preservation.

But when this Committee indicated in 1979 that it preferred 5.4 million acres of wilderness, including much of the most accessible timber, the Forest Service responded that it would have to further reduce the amount of timber available from 4.5 to 3.38 billion board feet per decade. The wilderness areas proposed by Congress would reduce available timber by 112 million board feet each year and cost Southeast Alaska jobs. Searching for a way to mitigate the impact of wilderness on the livelihood of Southeast Alaska residents, this Committee, but primarily Senators Jackson, Tsongas and the senior Senator from Alaska Ted Stevens, worked with the Forest Service to formulate what is now ANILCA Section 705.

Under this provision of ANILCA, the Forest Service would be given the funds, an appropriation at least $40 million each year, and authority to include additional timber, economically marginal because of its remoteness and quality, into the timber base. Without this special assistance and direction, this additional timber would be considered economically unsuitable for inclusion in the managed timber base. Including additional economically marginal timber lands into the timber base, termed intensive management, raised the sustained yield capacity of the multiple use forest, outside wilderness, from 3.38 to 4.5 billion board feet per decade and avoided economic dislocation in Southeast Alaska.

This is the core of the "1980 Deal" -- what I call the "price of wilderness" -- the law creating the wilderness also insured that 5.4 million acres of wilderness designations, including 1.6 million acres of commercial timber, did not reduce the timber supply below the Forest Service planning level and result in economic dislocation in Southeast Alaska. The House passed Tongass wilderness bill not only doubles back on the promises Congress made to Alaskans in 1980 but goes further to root out of the Tongass the timber industry and the communities which depend upon it.

H.R. 987 attempts to shut down the industry through cancellation of contracts and reducing the timber supply through termination of the intensive forest management program. And it would remove an additional 1.8 million acres from multiple use management -- making wilderness the dominant use of the forest.

This bill leaves only 37% of the entire 16.8 million acre forest available for multiple uses such as timber management, mining and road access hunting, fishing and recreation. This will greatly affect the future growth of the Southeast Alaska tourism industry and eliminate any possibility that many isolated communities would someday be connected by a road or utility system. Most important, however, is the fact that the 23 proposed wilderness areas, totaling more than 1.8 million acres, are aimed at the heart of the short term viability of the timber industry.

H.R. 987 also abrogates contracts with two pulp mills that depend on the Tongass forest for wood fiber. The exposure to the United States could be significant -- possibly running into the hundreds of millions of dollars. If the pulp mills have to close, the rest of the industry will collapse. This is because 49% of the trees are dead or dying or good only for making pulp. Half the wood fiber goes to the pulp mills and half goes to the saw mills. And the saw mills sell their chips back to the pulp mills. We have an integrated industry built up around the pulp mills. They are a critical component.

The 1947 Tongass Timber Act was more than enabling legislation for two pulp mill contracts, it was a federal commitment to the people of Southeast Alaska. Entire communities believed in and in fact were built on this commitment. Many people have located their families and invested in their homes and businesses in reliance on the United States living up to its end of the bargain. Cities were established and schools and hospitals were built. Families settled in and when the children reached adulthood they found work in the woods and homes near their parents. I know because I watched this take place as I grew up in Ketchikan and worked as a banker in Wrangell.

Both pulp mills used the long term timber supply as collateral to obtain financing and made huge investments in facilities. A year around timber industry grew up around the pulp mills including saw mills, logging camps, stevedoring operations and air taxi services. And when markets have been poor, as they were from 1981 to 1985, the pulp mills did not break their contracts with the United States and close their doors on the people of Southeast Alaska. Instead they used the 50 year timber contracts as collateral to finance prolonged operating at a loss. The Japanese-owned mill accumulated a staggering debt during the market depression of the mid-80's, but refused to close its doors, treating the upholding of its commitment to the U.S. a matter of honor.

According to the Forest Service, over the last ten years the Tongass timber industry has resulted in 11,900 direct and indirect jobs each year, on the average, and an annual payroll of $279 million. But these numbers have to put in perspective. The Tongass forest products industry accounts for 30% of all private industry employment in Southeast Alaska and is responsible for one quarter of the Southeast Alaska economy. These jobs are sorely needed in my State where we are currently experiencing double-digit unemployment. The two pulp mills are the only two year around manufacturing plants in Alaska. The federal regional development program for Southeast Alaska has worked and H.R. 987 pulls the rug right out from under it.

The feeling is that H.R. 987 essentially legislates the forest plan for the Tongass before its revision can be completed. The Tongass forest planning team has worked for two years at a cost of over $5 million to the taxpayer and the draft plan is due June 1 of this year, less than four months away. The Forest Service has held over 30 hearings in all communities across Southeast Alaska, hundreds and hundreds of people have invested their faith and valuable time in the forest planning process. I am aware that just the State of Alaska Department of Fish and Game has worked thousands of man hours, over 59 man months, preparing its input into the forest plan. All of this effort would be wasted if H.R. 987 becomes law. It is up to this Committee and the Senate to see that the taxpayer's money is not wasted in this way and that the Forest Service is allowed to carry out its responsibilities mandated under the National Forest Management Act and the Resources Planning Act.

The Tongass plan is the very first forest plan in the nation to be revised -- to circumvent the process in this way sets a very bad precedent. How many more forest plans for other national forests will be brought before this Committee to be tailored in a way which is advantageous to preservation interests before their revisions are complete? We have too much at stake in national forests across the Nation to make a mockery of the planning process.

Why the urgency? The Tongass is not being clearcut. The Forest Service plans to log only 1.7 million acres out of a 17 million acre forest over 100 year cycles in perpetuity. At present, this land base is managed to produce 45 billion board feet of timber during the next 100 years. In the second 100 year cycle, because of our extraordinary regeneration rates in Southeast Alaska, the same area will produce 90 billion board feet of timber. Once cut, timber management areas in the Tongass come back at twice the timber volumes.

But responsible forest management involves more than just sound sustained yield timber harvesting practices. We have 5.5 million acres of Congressionally designated wilderness in the Tongass National Forest which preserves one-third of the most magnificent old growth forest for the benefit of future generations. In fact, the one million acre Admiralty Island National Monument Wilderness is a model for the preservation of biodiversity which we should encourage other nations to follow. An additional one-third of the old growth forest is dedicated exclusively to non-timber uses such as wildland recreation. In all, due to the extremely valuable fish and wildlife, recreation and wilderness resources deserving special protection, 90% of the 17 million acre Tongass forest will never be logged. I challenge anyone to refute this fact.

Compare the harvest in the Tongass to timber harvest activity in other states. While we sustain one-fourth of Southeast Alaska's economy on a harvest of 450 million board per year from a 17 million acre forest, 8 to 10 billion, that's right billion, board feet are cut per year on the 23 million acres of national forest in Washington and Oregon. Commercial forest land in New York totals 17.4 million acres, or slightly larger than the Tongass. Yet over two and one-half billion board feet of timber is cut each year in New York, over five times the cut on the Tongass. Three times as much firewood alone. one and one-half billion board feet, is cut each year in New York as is cut for all purposes in the Tongass. And if cutting pulp wood is a problem, they cut 425 million board feet of pulp wood per year in New York while we try to sustain an integrated industry and the economy of a region on just that much in Southeast Alaska.

Shouldn't the Congress wait four months to see the most advanced and expensive resource analysis ever performed on a national forest and have the best judgments of the responsible resource professionals before statutorily mandating land use strategies for the Tongass National Forest? Southeast Alaskans think so. The Southeast Conference, representing the cities and business in Southeast Alaska, thinks so. The Alaska Congressional delegation thinks so. And the Administration thinks so. It is only the special interest groups seeking to maximize wilderness in all the National

Forests who are attempting to drive this process through Congress before the Tongass Land Management Plan revision is complete.

Finally, Mr. Chairman, I wish to commend the Southeast Conference for taking on the very difficult task of formulating a consensus Tongass position for Southeast Alaska. There are many people and interest groups who rely on the Tongass for their livlihoods and quality of life. Meeting the needs of all people is the most difficult type of balancing act and, in the final analysis, may not be possible. Nevertheless, the Southeast Conference has produced a policy proposal which attempts to address concerns about management of the forest while maintaining a viable timber industry. I believe the Southeast Conference has produced clear and workable goals and objectives for reform of the Tongass timber program.

The Board of the Southeast Conference recently met to clarify and emphasize for Congress particular points in their policy statement. On February 2, 1990, the Board voted by an overwhelming majority to clarify that (1) they oppose any additional wilderness in the Tongass or any statutory land classification that prohibits or impacts transportation and utility corridors, mining, or any other use other than timber harvest; (2) they recommend that the question of "buffer strips" along salmon streams and tributaries be addressed in the TLMP revision and not by Congress and; (3) they urge Congress to wait for the results of the TLMP revision before adopting any statutory land use strategy. In addition, they voted 9-2 to amend their land proposal to take into account the concerns of communities which were not provided adequate input into the March, 1989 policy statement and to adopt maps of areas with specific boundary lines to provide direction to Congress. It is critically important that the views of Alaskans living and working in the forest are reflected in any legislation mandating land uses.

Mr. Chairman, I have observed that my colleagues from the western states must continually oppose national preservationist group agendas for local land use in their states. Large areas of our states are owned by the federal government and the relationship between the federal land manager and local communities runs deep -- their livelihoods depend upon it. Many of my eastern colleagues will never fully understand how the large federal presence affects our workers, families, communities and our states in general.

Consider what it would be like to give up control of large land areas in your own states. What areas would you choose? Worse yet, what if the government decided for you? I have 56 million acres of the 90 million acre National Wilderness Preservation System in my State. The designated wilderness in Alaska is larger than the state of Idaho. One would think the Wilderness Act was written with only Alaska in mind -- but it wasn't.

How would my colleagues go about selecting which segment of your population would be allowed to remain and which would be required to relocate? And how would you choose which of your industries and communities would be dismantled "for the good of the Nation"? How would you explain to working mothers and fathers that they would no longer have a job to support their families because the government over 3,000 miles away in Washington, D.C. knew best how to allocate uses of the land?

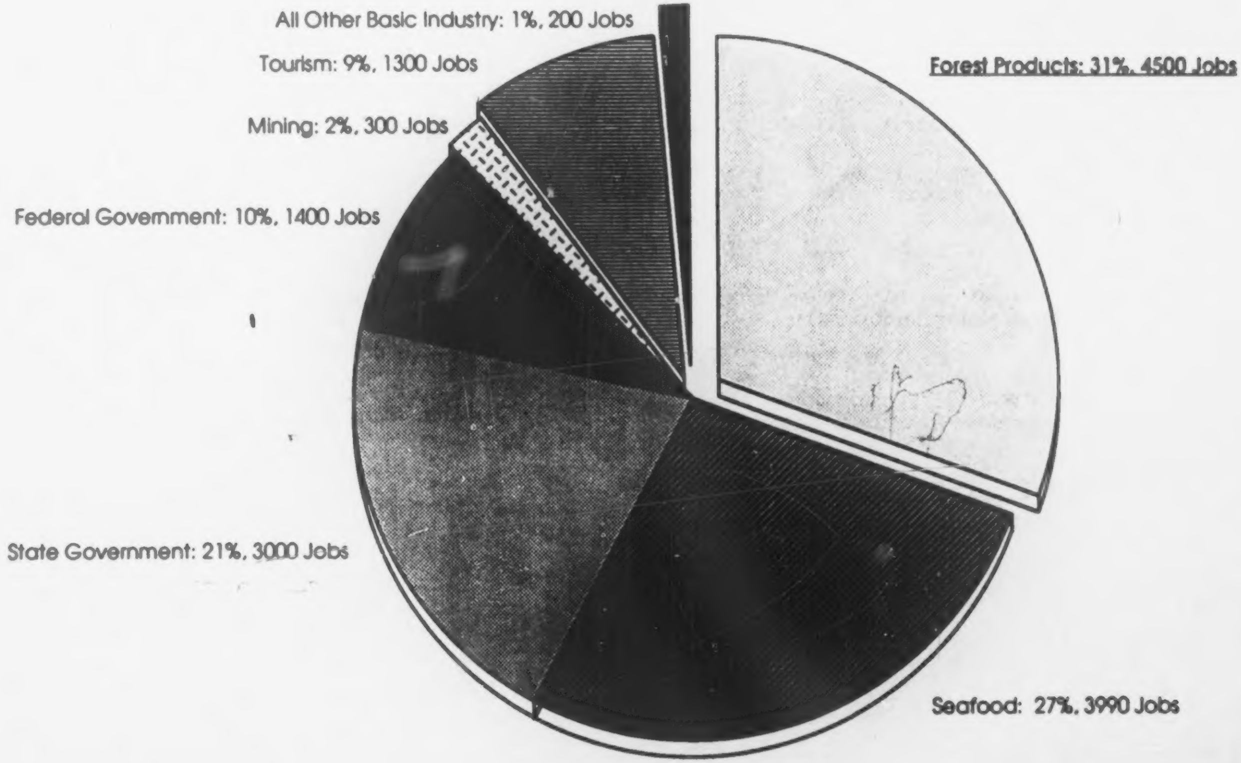
Mr. Chairman, the most difficult explanation of all is to explain to your neighbors and friends how people thousands of miles away with little or no knowledge about their community or traditions or way of life, people who have nothing personal to lose in the outcome of the decision could have more voice in the process than they have themselves.

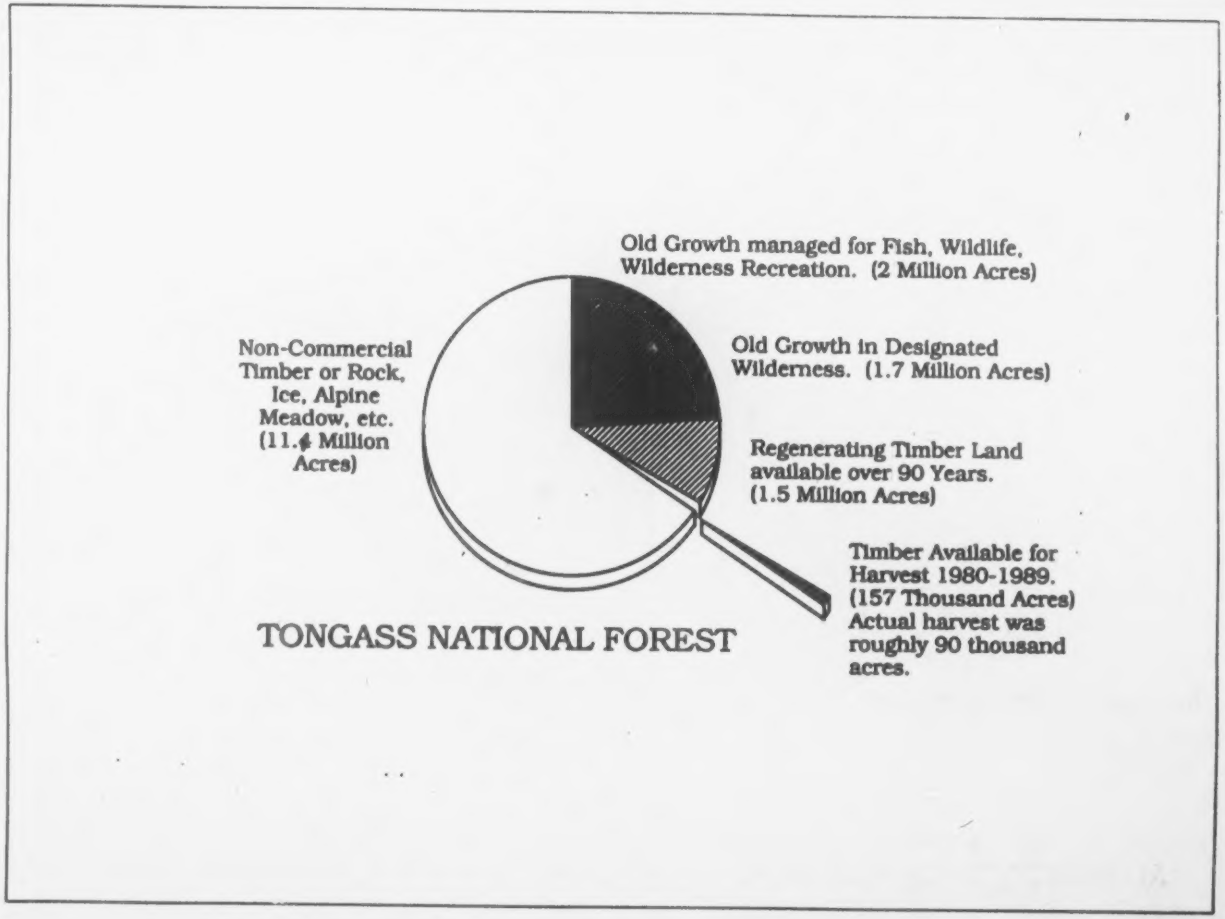
Mr. Chairman, I challenge this committee to put aside the House wilderness bill which is so unpopular in my state and to look to the Forest Service land planning effort, which will be available in June,for answers to the very difficult land allocation questions before us at this time. Thank you for holding this hearing today.

Southeast Alaska's Total Private and Government Basic Economy

(Measured in Terms of Annual Average Employment)

1989





TONGASS NATIONAL FOREST

TONGASS STATISTICS

TOTAL ACREAS IN THE TONGASS FOREST................................16.8 MILLION
- 9% of National Forest acreage in United States
- 95% of Southeast Alaska owned by federal government

ACRES OF COMMERCIAL FOREST LAND IN TONGASS...........5.4 MILLION
- 1.7 million acres (1/3) in Wilderness; permanently locked up
- 2.0 million acres (1/3) closed to logging by TLMP to satisfy legal req. for protection of fish, wildlife, recreation, etc.
- 1.7 million acres (1/3) scheduled for harvest over 100 yrs.

TOTAL WILDERNESS ACRES IN TONGASS................................5.4 MILLION
- 1.7 million acres of commercial forest land in wilderness
- Approximately the size of New Hampshire, larger than Mass.

FOREST LAND ACRES AVAILABLE TO LOGGING...................1.7 MILLION
- available for harvest over 100 year cycle
- maximum cut of 17,000 acres/year (1/10 of 1% of forest)
- average cut 1980-1988 is 7,000 acres

ACRES HARVESTED OVER LAST TEN YEARS.......Approx. 7,000 acres/yr.

TIMBER HARVEST LEVELS, 1978 - 1988 (in million board feet)

YEAR	MMBF	YEAR	MMBF
1978	414	1984	256.5
1979	422.1	1985	236.7
1980	428.3	1986	290.5
1981	387.1	1987	336.2
1982	366.7	1988	396.2
1983	251.4	1989	444

1988 JOBS (Ak Dept. of Labor)

Logging	2064	
Sawmills	398	3447
Pulpmills	882	
Longshore	296	
Towing	95	976
Road Const.	150	
Forest Serv.	435	

Total Direct Jobs = 4423

SOUTHEAST ALASKA SALMON HARVEST LEVELS

THE TONGASS NATIONAL FOREST HAS SUPPORTED A YEAR-AROUND TIMBER INDUSTRY SINCE THE 1950s WITH NO MEASURABLE IMPACT ON SALMON HARVESTS.

YEAR	MILLIONS OF POUNDS	MILLIONS OF DOLLARS
1979	72.9	84.9
1980	93.0	72.9
1981	110.7	82.4
1982	123.0	74.3
1983	155.7	63.3
1984	154.8	82.2
1985	231.0	99.0
1986	215.0	93.5
1987	73.5	64.1
1988	90.7	108.0

PRESIDENTS BUDGET BELOW COST TEST FORESTS

STATE	FOREST	RETURN FOR EACH $1.00 SPENT
Montana	Beaverhead	$0.25
Colorado	Arapaho & Roosevelt	$0.30
	Pike & San-Isabel	$0.33
	White River	$0.41
Georgia	Chattahoochee	$1.06*
Tennessee	Cherokee	$0.72
Virginia	George Washington	$0.45
Illinois	Shawnee	$0.16
Ohio/Indiana	Wayne-Hoosier	$0.97

* includes Oconee forest

Source: U.S. Forest Service FY89 TSPIRS

The Tongass National Forest is not included in the President's list because it is not below cost. The Tongass realized a return of $1.41 for every dollar spent on the timber program in FY 1989.

State	Acreage	% in Wilderness
Ohio	77	0.0003
New York	1,363	0.004
Massachusetts	2,420	0.05
Illinois	4,050	0.02
Mississippi	7,300	0.03
Maine	7,386	0.04
Pennsylvania	9,705	0.04
New Jersey	10,341	0.2
Nebraska	12,735	0.03
Indiana	12,935	0.06
Louisiana	17,046	0.06
Kentucky	18,056	0.07
Oklahoma	22,524	0.06
Alabama	33,396	0.1
North Dakota	39,652	0.1
Wisconsin	43,988	0.1
Vermont	58,539	1.0
South Carolina	60,539	0.3
Nevada	64,667	0.1
Tennessee	66,714	0.25
Missouri	70,860	0.2
South Dakota	74,074	0.2
West Virginia	80,631	0.5
Texas	81,196	0.05
New Hampshire	102,932	1.8
North Carolina	109,003	0.4
Arkansas	128,362	0.4
Hawaii	142,370	3.5
Virginia	169,453	0.7
Michigan	248,724	0.7
Georgia	460,215	1.2
Utah	802,189	1.5
Minnesota	804,489	1.6
Florida	1,420,420	4.1
New Mexico	1,609,797	2.1
Arizona	2,037,265	2.8
Oregon	2,093,888	3.4
Colorado	2,644,864	4.0
Wyoming	3,084,640	5.0
Montana	3,436,578	3.7
Idaho	4,001,535	7.6
Washington	4,252,344	10.0
California	5,926,158	5.9
Alaska	56,484,686	15.5

Where's the Wilderness?

A majority of the nation's wilderness, 62.3% of the system or 56.5 million acres, is in Alaska.

Most of the rest, one-third of the entire wilderness system, is in the western states. Thus, 95.3% of all the protected wilderness in the United States is in the 11 western states or Alaska. Only 4.7% of the nation's wilderness lies east of the 100th meridian, and almost half of it can be found in just two areas: Everglades National Park in Florida — the second largest wilderness area in the lower 48 states — and Minnesota's Boundary Waters Canoe Area.

The Northeast has the smallest amount of wilderness. In the 11 states from Maine to Maryland, where nearly one-quarter of the nation's population resides, there is a total of only 192,686 acres of wilderness. This represents just two-tenths of one percent of the wilderness system and less than two-hundredths of one percent of the land area of those states.

Nationwide, there are some 474 wilderness areas — 43 in Alaska and 431 in the rest of the United States. Federal wilderness areas are found in every state except Connecticut, Rhode Island, Delaware, Maryland, Kansas and Iowa.

The nation's largest wilderness area, 8.7 million acres, is in Wrangell-St. Elias National Park in Alaska. The largest wilderness area in the lower 48 states is the Frank Church - River of No Return Wilderness in Idaho, which totals 2.3 million acres. The nation's smallest wilderness area, just six acres, can be found on the Pelican Island National Wildlife Refuge in Florida, the first national wildlife refuge in America established in 1903. Outside of Alaska, California has the most wilderness.

THE WILDERNESS SOCIETY
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Role of the Tongass National Forest Timber Harvest in the Southeast Alaska Economy

February 1990

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Introduction

The Tongass National Forest is the mainstay of the Southeast Alaska economy. The region's timber, seafood, visitor and mining industries all depend on the forest's valuable natural resources. It should be no surprise that management of the 16-million acre Tongass National Forest is of vital concern to the residents of Southeast Alaska.

Certainly most Alaskans recognize the importance of the Tongass in the Southeast economy. After all, the rivers and streams of the Tongass bear the salmon harvested by commercial fishermen, tens of thousands of tourists enjoy the scenery and wildlife of the Tongass, and loggers, sawmillers, and pulpmill workers earn a livelihood from the forest's rich commercial timber stands. The minerals found within the forest are an increasingly important source of economic growth in Southeast. Unfortunately, little quantitative information exists concerning the various components of the Tongass economy or the overall economic impacts of the Tongass on Southeast Alaska. How can sound land management and resource allocation decisions be made without this important information?

Rapid increase in forest products industry employment over the last several years has added further confusion to the issue of timber industry impacts in Southeast Alaska. Forest products industry employment has nearly doubled since 1985. And this growth occurred at a time when parts of the Southeast economy – Juneau's economy in particular – were in a tailspin.

The purpose of this study is to measure one component of the Tongass economy – the employment and payroll generated as a *direct* result of Tongass timber harvests – and how that component fits into the regional economy. Direct employment includes all labor involved in accessing the timber (road building), falling the timber and transporting it to tidewater, stevedoring, transporting the logs to sawmills or pulpmills, and finally processing the logs into lumber or pulp.

Direct employment does not include labor involved in regular supplying of remote camps, transporting workers to and from camps (air taxi employment, for example), nor does it include labor employed in sales of logging equipment or contracted service of such equipment. These and similar types of labor are classified as indirect or support sector employment.

This study presents for the first time Tongass timber industry employment data based on original research. Measures of timber industry employment in Southeast are published regularly by the Alaska Department of Labor (ADOL). ADOL does not, however, differentiate between employment on the Tongass and employment on private timber lands. Further, ADOL estimates of timber industry employment in

Southeast exclude important components of the industry such as logging road construction, log trucking, and marine transport of the logs to sawmills and pulp mills. These integral segments of the timber industry account for hundreds of jobs.

The U.S. Forest Service makes estimates of Tongass timber industry employment but bases its estimates on ADOL numbers. The Forest Service assumes that the Tongass accounts for logging employment to the extent that the Tongass accounts for the total Southeast timber harvest. In other words, if the Tongass accounts for about half of the total regional harvest, it therefore accounts for about half of total regional employment. This may or may not be a valid assumption as timber harvest regulation and practices differ on public and private lands. The Forest Service also does not include road construction and log transport in its estimates of direct Tongass employment. Further, the Forest Service measures employment on a fiscal year basis. This results in slightly different employment estimates than produced by ADOL.

Finally, existing measures of Tongass timber harvest-related employment exclude any discussion of Forest Service employment. The USFS employs nearly 800 people in Southeast Alaska. A significant portion of this employment exists because part of the Tongass is managed for commercial timber harvest. Forest Service employment is an important component of the regional economy. Therefore, even beyond the private sector implications of Tongass management, Southeast Alaskans are concerned about the future role of the Forest Service in the region. Any discussion of the role of the Tongass timber industry in the regional economy must include some discussion of related Forest Service employment.

Clearly there is a need for in-depth study for all segments of the Tongass economy. This work will add a few pieces of important information to the Tongass land management process. And just as important, this work will hopefully set the stage for further study of this and other components of Southeast Alaska's greatest economic asset, the Tongass National Forest.

Methodology

The employment and payroll data presented in the study is the result of a direct survey of about 50 businesses participating in the Tongass timber industry. These businesses account for an estimated 95% of all Tongass timber-related employment. These businesses were asked to provide copies of the Employer's Quarterly Report forms which all Alaska employers are required to file with the Employment Security Division of the Alaska Department of Labor. On these forms, employers record the number of employed workers each month and the total wages and salaries paid for the three-month period. These are the same forms that ADOL uses to compile the employment and payroll data published in their *Statistical Quarterly* series.

While most of the businesses surveyed rely entirely on Tongass timber harvests, some also participate in timber harvest activities on private lands. These businesses were asked to estimate what percentage of their business is Tongass-related. That portion of employment that is not Tongass-related was not included in this analysis.

Included in this survey were Southeast's two pulp mills, seven sawmills, over 20 logging companies, about 15 logging-related construction companies, and six towing companies. One log scaling company was also surveyed.

Pulpmill employment was attributed entirely to the Tongass even though a portion (approximately 20%) of the utility grade logs processed at the mills comes from private lands. Pulpmill employment levels are relatively insensitive to production levels. Pulpmills must run three shifts a day on a continuous basis or face costly shutdown procedures. Even if the volume of wood flowing through the mill were reduced 20% the manpower requirement would be largely unchanged. It is true that with increased demand pulpmills can and do import utility grade logs from Canada but it is the Tongass which underwrites the fixed pulpmill labor force.

At the same time, the case could be made that since the pulpmills purchase utility logs from private harvests some portion of the employment in the private harvest is attributable to the pulpmills. But the pulpmills are not the only market for utility logs. Therefore, as long as other competitive markets for utility logs exist, it is not reasonable to credit the pulpmills with a portion of the employment on private land in Southeast.

Summary of Findings

The Tongass National Forest plays a vital role in the economy of Southeast Alaska. One important component of the Tongass economy is the forest products industry. The purpose of this study was to measure the employment and payroll generated in the Tongass forest products industry. The findings of this study are summarized below.

- The Tongass forest products industry generated an annual average of 3,050 private sector jobs in 1989.
- The total number of workers in the Tongass forest products industry exceeds 4,000.
- Workers in the Tongass forest products industry earned $111 million in wages and salaries during 1989.
- The Tongass forest products industry accounts for 30% of all private basic industry employment in Southeast Alaska.
- The Tongass forest products industry accounts for 75% of all forest products industry employment in Southeast Alaska.
- Including timber harvest-related Forest Service employment, the Tongass forest products industry generated 3,500 jobs and $125 million in payroll in 1989.
- Among all basic industry in Southeast Alaska, including government basic industry, the Tongass forest products industry accounts for 24% of all employment.
- The Tongass forest products industry is responsible for one quarter of the Southeast Alaska economy.

Chapter I. Employment and Payroll in the Tongass Forest Products Industry

In 1989, harvest and processing of Tongass National Forest timber generated an annual average of 3,050 jobs. The total number of workers in the Tongass forest products industry is much higher, probably over 4,500, but a portion of the industry is seasonal and therefore annual average employment is less than peak season employment. Payroll earned by workers in the Tongass forest products industry totaled $111 million. Tongass-related employment accounts for about 75% of all forest products industry employment in Southeast Alaska.

Included in Tongass forest products industry employment are 900 pulpmill jobs accounting for $39 million in payroll. These figures do not include pulpmill employed loggers or sawmill workers. Pulpmill employment has increased steadily since about 1985 but is still below the peak years of the early 1980s when employment topped 1,000 jobs. The pulpmills are the largest single employers in Sitka and Ketchikan.

Sawmills generated the annual equivalent of 540 jobs during 1989. Sawmill workers earned $18 million in wages and salaries. Sawmill employment is also at a five-year high but remains well below the 1980 level of 785 jobs.

Logging on the Tongass National Forest generated an annual average of 1,300 jobs during 1989. Tongass loggers earned $42 million in wages and salaries. Logging employment is at an all-time high for Southeast Alaska due in part to increasing Tongass harvest but also to significant harvests from privately held timber lands. As harvest from private timber lands decline, the Tongass will become even more important in the regional forest products industry employment picture.

Timber harvest-related construction added 160 jobs (annual equivalent) to the Tongass forest products industry. These construction jobs accounted for about $7 million in payroll earned during 1989.

Other basic components of the Tongass forest products industry added another 140 jobs and nearly $5 million in payroll. One hundred thirty-five towing and stevedoring workers earned $4 million. Log scalers accounted for the remainder.

The Tongass Forest Products Industry
Employment and Payroll in 1989

Industry Component	Annual Average Employment	Total Payroll
Pulpmills	900	$39.3 million
Sawmills	540	$17.8 million
Logging	1,300	$42.4 million
Construction	160	$6.6 million
Towing, Stevedoring and Other	150	$5.2 million
Tongass Industry Total	3,050	$111.3 million

Forest Service Employment Related to Tongass Timber Harvests

It is difficult to say with any certainty exactly how Forest Service employment would be affected by a reduction in the Tongass commercial timber resource base. Reallocation of federal funding to other types of Tongass management activities could mitigate Forest Service employment reductions. But in the present situation a very significant portion of Forest Service employment in Southeast Alaska is the direct result of management of a portion of the Tongass as a commercial timber resource. This employment would decline with a declining resource base.

The Forest Service allocates about 700 full-time equivalent positions to management of the Tongass National Forest including positions in the Forest and Regional offices. Workers in these positions earn an estimated $22 million in payroll annually (based on 1988 average salaries). Among these 700 workers, it is estimated that about 450 are directly involved in timber sale preparation, implementation and management. If there were no Tongass timber harvest these jobs would not exist. These Forest Service workers earn an estimated $14 million in annual payroll.

Total Tongass Forest Products Industry
Estimated Employment and Payroll in 1989

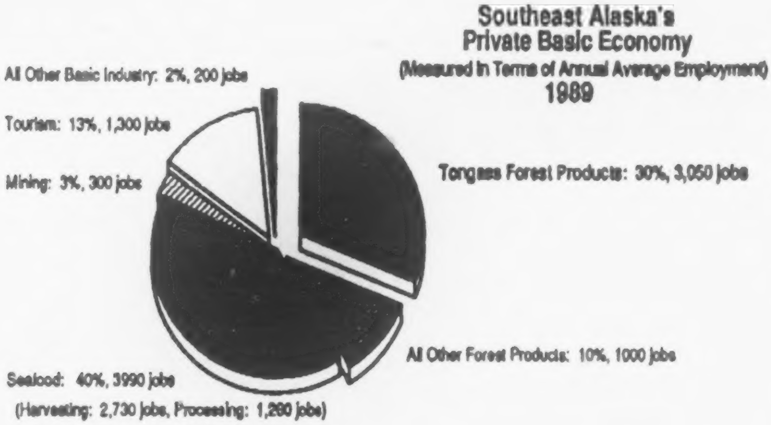
	Annual Average Employment	Total Payroll
Private Sector Total	3,050	$111.3 million
U.S. Forest Service*	450	$14.0 million
Grand Total	3,500	$125.3 million

* Timber-related Forest Service employment and payroll figures are McDowell Group estimates which are based on prior Forest Service estimates.

Chapter II. Overview of the Southeast Alaska Economy

With an annual average employment level of 3,050 workers, the Tongass timber industry accounts for 30% of all private basic industry employment in Southeast Alaska. The entire forest products industry, including employment in private timber harvests, accounts for about 40% of the region's private basic industry.

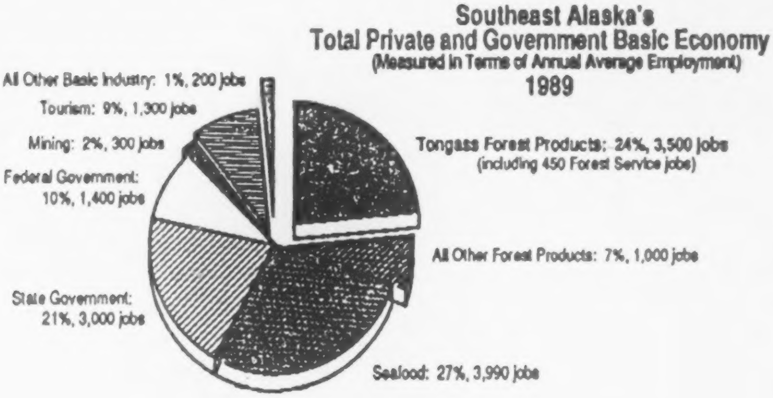
The seafood industry generates the annual equivalent of 3,990 jobs including 2,730 in seafood harvesting and 1,260 in seafood processing. Tourism adds an estimated 1,300 jobs to Southeast's basic economy. Both the seafood and tourism industries are largely seasonal industries with high participation levels but also with high non-resident components.



State and federal government are also important components in Southeast Alaska's basic economy. State government is the largest basic industry in Juneau but plays a comparatively small role in the economy of the rest of the region. State government employs about 5,000 workers in Southeast, including about 4,200 in Juneau. About 60% of the state government employment serves a statewide function and as such can be classified as basic industry. The remainder serves only the region's population and is therefore a part of the support sector.

Federal government accounts for about 2,800 jobs in Southeast Alaska. About 1,800 of these federal jobs serve the national interest and are therefore basic industry. All other federal jobs serve only the local population – such as postal workers – and are part of the support sector. The Forest Service and the U.S. Coast Guard are the largest federal basic industry employers in Southeast.

The role of the Tongass forest products industry among all basic industry, including government, is substantial. The Tongass forest products industry including related Forest Service employment accounts for nearly one-quarter (24%) of all basic industry employment in Southeast Alaska.


Southeast Alaska's
Total Private and Government Basic Economy
(Measured in Terms of Annual Average Employment)
1989

It is beyond the scope of this study to measure the indirect and induced impacts of the Tongass timber industry on the Southeast economy. However, it is important to note that the industry does have important secondary impacts and that indirect and induced impacts vary from one segment of the industry to another. The pulpmills have by far the greatest impact. They provide hundreds of high-paying, entirely resident jobs which account for a high level of local spending.

Further, pulpmills represent an important property tax base in Sitka and Ketchikan. The pulpmills add millions of dollars to local government coffers either through property tax payments or through electric power purchases, water purchases, and purchases of other public utilities. These property tax payments and high volume purchases of public utilities help keep local government and public utility costs lower for residents of the communities.

All told, without the pulp mills, the economies of Sitka and Ketchikan would shrink by nearly one-third and some costs of living for remaining residents would increase significantly. Hardest hit would be property values. The Anchorage real estate market collapsed with the loss of 10% of the economy. Sitka and Ketchikan would see much more severe consequences.

Sawmills have comparatively high indirect and induced impacts. They too have generally well paid, resident workforces and they too represent important industrial property tax bases. Among the various components of the forest products industry, remote logging camps have the lowest level of indirect and induced impacts. Remote logging operations do provide a significant market for many Southeast Alaska service and supply businesses.

In summary, the industry has played a critical role in the economic development of Southeast Alaska. In addition to the 3,500 jobs created as a direct result of Tongass timber harvests, many more jobs are created in the region's service and supply sector.

RIPARIAN RESOURCE MANAGEMENT IN A MULTIPLE-USE FOREST

Prepared By
Douglas J. Martin Ph.D.
Pentec Environmental Inc.
February 23, 1990

RIPARIAN RESOURCE MANAGEMENT IN A MULTIPLE FOREST

Two objectives of riparian management in a multiple-use forest are to preserve the biological productivity of salmon streams and to manage for a sustained-yield of timber. Both objectives are accomplished through the application of coordinated management guidelines. Forest managers design guidelines to provide timber harvest, while emphasizing fish habitat protection and enhancement. The current Forest Service policy is to:

> "Manage riparian areas under the principles of multiple-use and sustained-yield, while emphasizing protection and improvement of soil, water, vegetation, and fish and wildlife resources. Give preferential consideration to riparian dependent resources when conflicts among land use activities occur" (National Riparian Policy, FSM 2526.03).

Forest Service management guidelines for protection enhancement of salmonid habitat, or both are based on the best available scientific information. The guidelines and prescription for riparian management (USDA Forest Service 1986), are designed to maintain:

- stream bank and stream channel stability
- suitable water temperatures

- water quality within established State standards
- present and future sources of large woody debris (LWD)
- and improve primary and secondary biological productivity

The type of management prescriptions applied and the level of habitat protection required are dependent on the presence or absence of fish species (i.e., stream classes: I anadromous, II resident, and III no fish) and channel geomorphic types (e.g., bedrock or gravel substrate, channel incision, and channel gradient). Because the presence of fish species and channel types very within and between streams, a range of management options are available to match the specific habitat requirements within a stream reach. Such options may include: variable width no-cut buffer zones ranging from 25 to several 100 feet, selective tree harvest within riparian management zones, and combinations of buffer and riparian management zones. This management flexibility provides the most effective protection of fish habitat and enables the harvest of timber in the riparian zone, which is not required for fish habitat.

Application of riparian guidelines requires planning and coordination among an interdisciplinary team (IDT) of resource managers with expertise in fisheries, forestry, and hydrology. Minimum standards and management prescriptions developed by the Forest Service for each stream class and channel type (USDA Forest Service 1989), are used as a guide by the IDT to prepare riparian management plans for all streams. In addition, information collected from site reconnaissance surveys are utilized to refine project-level plans and to tailor management prescriptions to site-specific conditions. The planning process results in the application of management prescriptions, that accomplish Forest Service management objectives and minimize the probability of catastrophic damage to fish habitat.

Substitution of a fixed 30-meter buffer on all streams (proposed by National Marine Fisheries Service) for the Forest Service management guidelines does not accomplish the objectives of a multiple-use forest. The fixed-width buffer will result in:

1. Fewer timber harvest opportunities; more timber will be left standing along streams; and access to timber will be limited or possibly blocked off by buffer zones.

2. Increased sediment production from the additional roads required to harvest the timber, which is blocked off by buffer zones.

3. Less habitat enhancement opportunities (e.g., canopy openings and LWD placement); and minimal planning will reduce enhancement potential while restricted access prevents enhancement during logging operations.

4. Increased probability for catastrophic damages; increased roading associated with buffers will increase the potential for both landslides and debris torrents, and a 30-meter buffer may not be sufficient to prevent landslides.

If the 30-meter buffer proposal was modified to include the identification and application of additional measures to minimize catastrophic damages, the fixed width approach becomes no different from the site-specific management conducted by the Forest Service. The modified buffer proposal, however, would not provide the timber harvest and habitat enhancement opportunities afforded by the Forest Service program. The only benefit gained from the 30-meter proposal would be a reduction in the frequency of minor habitat damages that may occur from felling and yarding timber adjacent to streams; a benefit that may be nullified by a catastrophic event.

Neither the Forest Service program nor the 30-meter buffer proposal provides a guarantee of no habitat damage. Although landslides, debris torrents, and bank erosion are natural events in Southeast Alaska, improper logging and poor forest management can increase the frequency of these events. Recognition of this fact caused resource managers to form IDT's and to apply the best available scientific data for management of a multiple-use forest.

The use of IDT's and the application of management prescriptions for particular stream classes and channel types is the current state of riparian resource management. This approach worked successfully in the State of Washington (Bilby and Wasserman 1989) and was supported by research in Washington (Bilby and Wasserman 1989), British Columbia (Hartman et al 1987), and Alaska (Murphy et al 1987).

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3584C

QUESTIONS PERTAINING TO RIPARIAN MANAGEMENT
FOR
DOUGLAS J. MARTIN Ph.D.

1. Does logging of streamside timber affect salmon habitat and production?
2. Has logging of streamside timber resulted in irreparable damage to salmon habitat and production?
3. What are the differences between the Forest Service riparian management policy and that proposed by the National Marine Fisheries Service?
4. What are the positive and negative aspects of the Forest Service Policy?
5. What are the positive and negative aspects of the fixed 30-meter buffer?

3584C

Senator MURKOWSKI. I again thank you, Mr. Chairman, for giving Alaskans an opportunity to express their opinions. We look forward to hearing their views.

The CHAIRMAN. Thank you very much, Senator Murkowski.

Our first witness is Patricia Kearney, who is Acting Assistant Secretary for Natural Resources of the Department of Agriculture. She is accompanied by: George Leonard, Associate Chief of the Forest Service of the Department of Agriculture; Mike Barton, who is Regional Forester of the Alaska Region in Juneau; David R. Gibbons, Regional Fisheries Biologist, from Juneau, Alaska.

Also to come to the table at this time would be: Dr. James V. Brooks, Deputy Director of the Alaska Region for the National Marine Fisheries Service in Juneau. That is Department of Commerce. He is accompanied by K. Koski, who is Fisheries Biologist at Auke Bay Laboratory, National Marine Fisheries Service, in Auke Bay, Alaska.

Ms. Kearney.

STATEMENT OF PATRICIA KEARNEY, ACTING ASSISTANT SECRETARY FOR NATURAL RESOURCES, DEPARTMENT OF AGRICULTURE, ACCOMPANIED BY GEORGE LEONARD, ASSOCIATE CHIEF, FOREST SERVICE; AND MIKE BARTON, REGIONAL FORESTER, ALASKA REGION, FOREST SERVICE

Ms. KEARNEY. Mr. Chairman and members of the subcommittee:

Thank you for the invitation to appear before you today to express the Administration's views on H.R. 987, the Tongass Timber Reform Act.

With me today, as you mentioned, are: George Leonard, Associate Chief of the Forest Service; and Mike Barton, from Alaska.

Alaska is a very special place to all Americans and we in the Administration are very sensitive to the need for wise conservation and multiple use of the State's precious and unique resources.

As you know, the National Forest Management Act of 1976 required, one, the preparation of land management plans; and two, that these plans be revised periodically to accommodate changes in management needs. The revision of the Tongass forest plan is the nation's first revised plan, and it is scheduled to be completed in draft form in the next few months.

This draft will outline proposed changes by displaying a number of management options. These options should reflect any significant changes in public interest and any significant economic considerations which have occurred over the past ten years since the first plan was actually put together and implemented.

The Forest Service has spent about $7 million during the past two years working on this revision. It is a multi-disciplinary effort and it will reflect the work not only of the Forest Service scientific and management team, but also the work of interested citizens, agencies, and interest groups.

We feel that the revised plan will provide much better information upon which to make important land use and management decisions that are required to maintain the quality of the forest resources.

Therefore, we strongly urge the Congress to defer current legislative action and allow the process which was mandated by the National Forest Management Act to continue until completion of the draft in June, at which time comments will be received from the public.

George Leonard is prepared to give you more details on the Department's views on all of this. Again, thank you for the opportunity to appear here before you today.

The **Chairman**. Thank you very much, Ms. Kearney.

Mr. Leonard.

STATEMENT OF GEORGE M. LEONARD, ASSOCIATE CHIEF, FOREST SERVICE, DEPARTMENT OF AGRICULTURE

Mr. **Leonard**. Thank you, Mr. Chairman. I appreciate the opportunity to visit once again about the Tongass National Forest.

The Tongass is certainly a place of great beauty and of abundant resources. It is of extreme national interest. As Senator Murkowski has noted, it is a land of superlative wilderness. It is a land of tremendous salmon fisheries.

But it also should be recognized that it is a land of highly productive timber land, land that is well adapted to management on a sustained yield basis. And that is really what the debate is about: How much is going to be wilderness and how much will be managed for its timber production?

On the issue of protecting riparian areas, there is simply no question that the riparian areas on this and other national forests deserve and need special attention. They are highly productive and important to that ecosystem. They are important to that salmon fishery in the Northwest.

The question is how best to achieve that protection. The Act that we are considering today would mandate the establishment of a 100-foot buffer strip adjacent to salmon-producing streams, adjacent to the tributaries to those streams, and adjacent to streams which support resident fisheries.

We believe that greater protection of those streams can be achieved through a management scheme which is currently in place on the Tongass, in which site-specific prescriptions for each stream along which any management activity, particularly logging, will take place are prescribed by an inter-disciplinary team made up of wildlife biologists and other resource management specialists.

We currently have 24 wildlife biologists on the Tongass Forest today. Most of them are directly involved in ensuring that the timber management activities that take place on that forest are done in a way that protects and recognizes the high quality of that fishery.

The general plan is done in accordance with an aquatic habitat handbook which was developed in cooperation with all of the agencies with responsibility for management of that fisheries resource: the Forest Service, the Alaska Department of Fish and Game, the U.S. Fish and Wildlife Service, and the National Marine Fisheries Service.

It's our judgment that this site-specific prescription which recognizes the needs of individual streams and which provides that protection is the best way to enhance and protect the anadromous fisheries on the Tongass National Forest.

As part of the Tongass land management plan revision, we are relooking at the existing wilderness areas on the Tongass to determine what is the best long-term management, in view of their spectacular scenery, their high resource values, as well as the needs for producing timber to sustain the existing industry and provide wood products that are sold in the world trade.

There are some 1.6 million acres of commercial forest land in wilderness today. The 1.8 million acres that would be added under H.R. 987 contains almost 250,000 acres of land that are currently judged as suitable for timber production. Removal of these lands would have a significant impact on our ability to maintain timber supplies needed by the existing local industry.

Designation of some of these wilderness areas would block access to timber land not included in wilderness, but for which access should go through these areas.

We are examining these areas through the process of revising the land management plan, and we strongly urge that action on this designation await the completion or at least the draft stage of that revision process. We believe this will provide the Congress with good sound information on the resources and on the interests of the public in long-term management of that resource, and will provide a better long-term basis for management.

The CHAIRMAN. Let me interrupt you at that point. You and Ms. Kearney both say we should stay the process until the report comes out.

Mr. LEONARD. Yes.

The CHAIRMAN. You recognize that that would mean basically staying the bill for this Congress? If we held this thing up until the plan comes out in June and then held hearings on it and then went to markup after that, we would be at the end of the appropriations cycle and the bill, unless it was passed by consensus, which it probably would not be, would be pretty well dead for this year.

Are you saying in effect we ought to put it over until the next Congress?

Mr. LEONARD. I think that making these judgments on the basis of sound data, particularly in a situation, as here, where the interests are extremely polarized and this is simply a tremendous emotional issue among people, and delaying until there is a sound data base to evaluate the impacts of the decisions that are to be made I think will result in better long-term public policy.

None of the areas that are being proposed for wilderness will have their status affected during that delay. There are no actions planned in those areas this year. So it is not as though these areas are currently threatened and the Congress must rush into action.

We think there is real merit in waiting until you have a good data base, a good understanding.

The CHAIRMAN. Even if that means waiting until next year?

Mr. LEONARD. Even if that means waiting until next year, yes, sir.

Just to finish my statement, we expect to have a draft of that plan out in June, and that certainly would provide a sound analysis of the alternatives. The final plan would be completed some time toward the end of the calendar year, and we would strongly urge that Congress delay action until that data is available.

[The prepared statement of Mr. Leonard follows:]

STATEMENT OF
GEORGE M. LEONARD, ASSOCIATE CHIEF
FOREST SERVICE
UNITED STATES DEPARTMENT OF AGRICULTURE

Before the
Subcommittee on Public Lands, National Parks and Forests
Committee on Energy and Natural Resources
United States Senate

Concerning
H.R. 987, an act "To amend the Alaska National Interest Lands Conservation Act,
to designate certain lands in the Tongass National Forest as wilderness,
and for other purposes"

February 26, 1990

MR. CHAIRMAN AND MEMBERS OF THE SUBCOMMITTEE:

Thank you for the opportunity to present the Departments view's on H.R. 987, the Tongass Timber Reform Act. With me today is Mike Barton, Regional Forester for Alaska.

The Administration opposes enactment of H.R. 987.

H.R. 987 would repeal sections 705(a) and 705(d) of the Alaska National Interest Lands Conservation Act (ANILCA), terminate the existing long-term timber sale contracts in Alaska, require 100-foot buffer zones along anadromous fish streams and their tributaries in which no logging would be permitted, and designate 23 new wildernesses areas in the Tongass National Forest.

As you requested, our testimony today will focus on the proposed buffer zones along anadromous streams and the designation of new wilderness areas.

Buffer Zones (section 104)

We strongly support special management of riparian areas to protect key fish and wildlife resources. The National Forest Management Act and our implementing regulations already require the protection of fish habitat within the National Forests. We give priority consideration to riparian resources including actions needed to maintain or enhance fish habitat and water quality. Site-specific prescriptions result in variable buffer widths depending on the on-site conditons, and may extend well beyond 100 feet.

A single minimum-width buffer zone policy does not recognize the tremendous variability in site-specific conditions nor the range of respective management options available and often necessary to achieve our overall management objectives. Therefore, we object to a legislatively mandated buffer, preferring instead to continue our work with other Federal agencies and the State of Alaska to develop appropriate site-specific standards to address these concerns.

Our streamside management today is based on the sound application of the best riparian and instream habitat technology available. Professional fisheries biologists, hydrologists, Forest Supervisors, District Rangers, and other field personnel are committed to protecting stream and streamside resources. Our nationwide fisheries initiative, "Rise to the Future", has provided a growing force of professional fisheries biologists at all levels of the organization.

We have 24 full-time biologists on the Tongass National Forest today. These fisheries experts are working with all other professsional and technical disciplines to provide an increased emphasis on quality management of the fishery habitat in each of the forest planning areas. A part of this initiative is the strengthening of our fishery and riparian habitat monitoring efforts.

Following field investigations, streamside management prescriptions are implemented to protect or enhance fish habitat at specific sites. In 1986, an Aquatic Habitat Management Handbook was prepared by a team of professionals from the Forest Service, Alaska Department of Fish and Game, U.S. Fish and Wildlife Service, and National Marine Fisheries Service. This document now guides our field personnel in protection of the fisheries resource. The factors we consider include stream class, stream channel and bank characteristics and condition, water temperature, soil characteristics, fish passage capability, water quality, the amount of large woody debris, and the timing of bridge and culvert installation.

During the timber sale planning process, we provide an individual design for each stream and utilize timber harvest prescriptions and practices as tools to modify the forest vegetation to achieve a desired vegetative outcome. We believe this is the best way to protect the fisheries resource while also managing other resource opportunities.

As passed by the House on July 13, 1989, section 104 of H.R. 987 would require buffer zones along all streams except those with no resident fish populations and those that are very small or do not flow year-around. This would significantly and unneccesarily reduce other management options. The importance of protecting the ecological function of anadramous streams is undisputed, however, we feel this can best be accomplished with site-specific designs developed by resource professionals representing the Forest Service, other concerned Federal agencies, and the State of Alaska.

Additional Wilderness Designations (Title III)

As part of the Tongass Land and Resource Management Plan revision, we are considering many interrelated planning questions including: What primitive unconfined outdoor opportunities are provided by the non-designated wilderness lands? How should wilderness and unroaded areas be managed to meet future demand for recreation use? What effect does wilderness designation have on the tourism/recreation industry? Where and how much commercial activity should be permitted in wilderness? Are other designations such as Wild and Scenic Rivers more appropriate? Are additional wilderness designations needed?

There are 1.6 million acres of commercial forest land within existing designated wilderness on the Tongass. The 1.8 million acres proposed for wilderness designation by H.R. 987 contain about 700,000 acres of commercial forest land, of which 250,000 acres are scheduled for harvest over the next 100 years in the current Tongass Land Management Plan. This potential reduction in the Forest's suitable timber base could adversely affect our ability to provide a supply of timber to local mills. Designation of these areas as wilderness might also block access to timber in areas not designated as wilderness. We also recognize that many areas on the Tongass National Forest are used for their fish, wildlife, and recreation values, and many people want these areas managed to retain their pristine nature. However, wilderness designation is not the only way to protect these important wildlife and recreation values.

We strongly recommend against designating additional areas as wilderness without a complete evaluation of the various options available (including Wild and Scenic Rivers). The Tongass plan revision process is making this evaluation now.

Tongass Land and Resource Management Plan

We are following congressional direction in the National Forest Management Act (NFMA) to periodically revise Forest Plans, and the revision of the Tongass plan is well underway. The Tongass was the first National Forest to complete a forest plan under NFMA, and it will be one of the first to complete a revised plan.

When the Alaska National Interest Lands Conservation Act was passed in 1980, Congress used information from the original Tongass plan in formulating the legislation. The NFMA process can again provide important information for the Congress and others as legislation such as H.R. 987 is considered.

From the start of the plan revision process, we have encouraged public participation. We have held public meetings in most of the communities in Southeast Alaska, Anchorage, Seattle, and Washington D.C. We have also received written input from many people. Public concerns and input will be addressed in the plan revision.

We have implemented a Geographic Information System (GIS) to help our team of professional resource specialists and the public analyze data on the Tongass--our largest National Forest. Implementing GIS has not been without difficulties, but we have made significant progress, and the results are now paying big dividends.

For example, we are now better able to predict changes in wildlife and fish habitat capability that could occur as a result of resource management activities. New wildlife and fish habitat capability models have been jointly developed by professional biologists from the Forest Service, Alaska Department of Fish and Game, U.S. Fish and Wildlife Service, and the National Marine Fisheries Service Our predictions for fisheries habitat show that capability will be maintained or enhanced under various resource management options.

New stream inventories have been or are being completed. Studies relating to projected demands for recreation, timber, subsistence use, fish, and wildlife are also underway. New research results are also being incorporated. Based on this new information, the draft Environmental Impact Statement will describe and evaluate alternative ways to manage all the resources of the Tongass--fish, wildlife, wilderness, timber, and recreation.

We have reached an important milepost in the Tongass plan revision process. "Understanding the Past...Designing the Future" is a new publication that provides the public with a non-technical overview of resource relationships, opportunities, and limitations on the Tongass National Forest. Copies of

"Understanding the Past ... Designing the Future" have been provided to the Subcommittee.

We are considering a wide range of alternative management themes consistent with the identified public issues and the assessment of resource conditions. These alternative management themes include:

- The actions that would be required if H.R. 987 were enacted;

- The Alaska Southeast Conference proposal that would incorporate a mix of commodity and amenity values suggested by a coalition of Southeast Alaska communities.

- The current management direction; and

- An alternative that would emphasize the economic value of the mix of those resources produced on the Tongass.

These alternative themes will be used to develop, analyze, and compare management alternatives. If, as a result of our resource analysis and review of public comment, we determine that an alternative not consistent with the goal of 4.5 billion board feet per decade is appropriate, we will recommend that the current statutory direction be modified.

Our goal is to complete a draft Environmental Impact Statement for the revised plan by mid-summer. Information from our data and complex modeling using the GIS computer system and the FORPLAN model will enable us to show the public and the Congress how different alternatives respond to public concerns and resource conditions.

We believe that any major change in the present statutory direction for the management of the Tongass is premature. Possible statutory changes could best be addressed after the draft Environmental Impact Statement is available to the Congress and the general public.

In conclusion, we are doing our best to carry out congressional direction in fulfilling our land stewardship responsibilities on the Tongass National Forest. We believe that a major statutory change would be premature at this time. We are only 3 or 4 months from the release of the draft EIS for the revision of the Tongass Land and Resource Management Plan. We urge the Congress to wait for this new information before considering major statutory changes such as those in H.R. 987.

Mr. Barton and I would be happy to answer your questions or provide any additional information you may desire.

The CHAIRMAN. Thank you very much, Mr. Leonard.

Next we will hear from Dr. James W. Brooks, Deputy Director of the Alaska Region for the National Marine Fisheries Service. Dr. Brooks.

STATEMENT OF DR. JAMES W. BROOKS, DEPUTY DIRECTOR, ALASKA REGION, NATIONAL MARINE FISHERIES SERVICE, DEPARTMENT OF COMMERCE, ACCOMPANIED BY DR. K. KOSKI, FISHERIES BIOLOGIST, AUKE BAY LABORATORY, NATIONAL MARINE FISHERIES SERVICE

Dr. BROOKS. Thank you, Mr. Chairman. A special hello to our own Senator Murkowski and the gentlemen of the committee. I am pleased with the opportunity to address you today.

NOAA has responsibilities for the conservation, management and development of the nation's living marine resources. These include salmon.

The salmon resource of Southeastern Alaska is worth about $125 million a year, not counting the additional value of the subsistence and recreational use of that resource. The habitat that supports that resource, therefore, is also of much concern to NOAA.

I would like to move directly to the issue of mandatory 100-foot buffer strips along salmon streams that is provided for in H.R. 987. NOAA endorses that mandatory provision and feels that if it is not mandatory then there is an unacceptable risk of not having adequate protection over the long term.

Our studies, which now include some 20 published referred scientific articles on this very subject, demonstrate clearly that the quantity and quality of salmon habitat is directly related to the size and quantity of trees adjacent to streams and actually in the streams.

When they are in the streams, they are usually termed "large woody debris." This large woody debris is—and by that I mean logs—recruited to the streams mainly from the banks, essentially all of it from within 100 feet.

Very large trees within this zone are valuable. They are attractive to the industry, to foresters. They are called money trees. In the jargon of the industry, they are called "pumpkins." The industry and, it seems, the Forest Service believes that such trees may safely be harvested from these 100-foot buffer zones.

Even if logging techniques could be developed to pluck these giants out of a narrow buffer strip without the appearance of immediate damage, we believe the longer term degradation of the salmon habitat is certain. These trees may be 300, 600, 900 years old. They are wind-firm. They have withstood everything nature could throw at them for centuries. They protect everything else in that environment. If you take them out, you accelerate all manner of changes, few if any of which will be beneficial for the habitat of salmonid fish. When they do fall, they contribute beneficially to the fish and wildlife habitat for a century or more, depending on their size.

I certainly commend the attitude of present Forest Service administrators for embracing the concept and policy of buffer strips or leave strips along these streams. Still, I must point out that people and attitudes and budgets change over time.

I can give you some perspective from my personal professional career in Alaska, which dates back to being a member of the Civilian Conservation Corps some 50 years ago near Ketchikan. And I have had almost a continuous involvement with resource management since that time, except for periods during World War II and times at various universities.

At the time the Alaska Pulp Corporation commenced logging to supply the Sitka mill, I spent quite a bit of time traveling with the regional forester, Mr. Pete Hansen, and we looked at many of the cuts. We had biologists in the field with the foresters and the industry people agreeing on buffer zones.

Things were looking pretty good the first few years of the 1960's in that area. However, the regional forester changed. Various district foresters changed. And all of the leave strips that we were proud of were subsequently harvested. None of them remain.

Some 15 years ago, after pleading with another regional forester to respect the requirements of salmon streams and leave buffer zones, I was introduced to a gathering of timber industry people in our capital city of Juneau by the regional forester as the man who was trying to destroy the timber industry.

I want to point out now that the present forest administrators seem to much better appreciate the multiple values that exist in the forest. I think they by-and-large agree, there is a near-consensus that buffer strips are important in preserving salmonid habitat.

We are bickering now about a few of these pumpkins in a 100-foot zone along anadromous fish streams, and those we feel are so important. Let me point out, if the industry is willing to come before Congress and argue in behalf of harvesting these few money trees in the buffer zones, what chance does a fishery biologist have in the field of protecting those trees if indeed you decide that it is discretionary with the foresters?

I will say that the site-specific procedure recommended by the foresters sounds very good. It is highly sophisticated. In fact, it is so highly sophisticated that it will demand a level of human expertise that I do not think can practically be staged in the field.

That concludes my statement.

[The prepared statement of Dr. Brooks follows:]

STATEMENT OF
DR. JAMES BROOKS
DEPUTY REGIONAL DIRECTOR, ALASKA REGION
NATIONAL MARINE FISHERIES SERVICE
NATIONAL OCEANIC AND ATMOSPHERIC ADMINISTRATION
U.S. DEPARTMENT OF COMMERCE

BEFORE THE

SUBCOMMITTEE ON PUBLIC LANDS, NATIONAL PARKS AND FORESTS
COMMITTEE ON ENERGY AND NATURAL RESOURCES

UNITED STATES SENATE

February 26, 1990

Mr. Chairman and Members of the Subcommittee:

I am Dr. James W. Brooks, Deputy Director of the Alaska Region of the National Marine Fisheries Service (NMFS), National Oceanic and Atmospheric Administration (NOAA). I appreciate the opportunity to appear before this Subcommittee on behalf of the Department of Commerce to discuss the provisions of H.R. 987 relating to fisheries protection and buffer zones.

The Department of Commerce/NOAA has primary Federal responsibility for the conservation, management, and development of marine living resources and shares Federal responsibility for the conservation and management of anadromous fish and the protection of certain marine mammals and endangered species under numerous Federal laws. For this reason, the Department is vitally concerned about the habitats that support these resources since the well-being of these resources and the fishing industry depends upon healthy and productive habitats.

NOAA has been involved with research on the effects of timber harvest on the Tongass National Forest since the mid-1950's. Our research staff has studied the effects of timber harvest on anadromous fish streams in the Tongass National Forest and is recognized for their expertise on logging and riparian issues. They have published extensively and have authored over 20 scientific publications which apply directly to this issue. Our habitat management staff has worked closely with the issue through evaluation of numerous environmental studies, participation on interdisciplinary teams drafting guidance documents, and through planning processes such as the Tongass Land Management Plan.

Anadromous fish streams on the Tongass National Forest support all five species of Pacific salmon (pink, chum, coho, sockeye, and chinook). The commercial harvest of salmon in southeast Alaska was valued at $128 million (ex-vessel value) for 1989. According to the U.S. Forest Service, ninety percent of those fish came from stream habitat within the Tongass National Forest. Recreational fishing also contributes a substantial amount to the economy of southeast Alaska. Recreational fisheries in Juneau alone amount to about $15 million annually. Subsistence fisheries for salmon in southeast Alaska amount to an additional $2.5 to $6.0 million annually. Reasonable and prudent timber harvest practices are extremely important to sustaining these vital fisheries.

In 1976, the NMFS Alaska Region issued a policy statement calling for mandatory buffer zones of riparian vegetation along all salmon streams. Extensive research on buffer zones and salmonid habitat requirements resulted in a revision of the NMFS Policy in May 1988. This revision, which was based on a greater understanding of the importance of buffer zones, specifies a minimum no-harvest protective buffer zone along all streams in Alaska that are important to anadromous fish.

It states:

> "In order to maintain optimum production of anadromous salmonids the NMFS policy is to advocate the protection of riparian habitat through the retention of buffer zones along all anadromous fish streams and their tributaries in Alaska. NMFS will seek to ensure that a minimum buffer zone width of 30 meters (100 feet) be maintained on each side of the stream, and should consist of the natural/existing undisturbed forest. This policy addresses only the minimum buffer zone width. In some cases a wider zone is necessary to protect fisheries resources. Additional research is needed from which more site-specific prescriptions can be developed."

The buffer width recommendation is based on scientific evidence compiled from research conducted in Alaska under the auspices of the Alaska Working Group on Cooperative Forestry/Fisheries Research which is comprised of State, Federal, and private entities and from the extensive research conducted in the last 10-15 years throughout the Pacific Northwest. Scientists and managers agree that the natural undisturbed riparian vegetation adjacent to streams is a critical and integral component of fish habitat. Salmonid habitat depends on riparian vegetation in the old-growth forest to provide large woody debris (LWD), shade and cover, temperature moderation, streambank erosion protection, and to maintain water quality. LWD is the single most important component responsible for forming the majority of habitat (e.g., pools, undercut banks, instream cover, stable spawning beds, channel morphology, etc.) critical to the production of salmonids in the Pacific Northwest and Alaska. Research in Alaska has shown that nearly all (99%) of the LWD in streams comes from trees growing within 30 meters (100 feet) of the streambank. Nearly 1/2 of the LWD was from trees that had stood on the lower bank (less than 1 meter away), and 95% was from trees within 20 meters of the stream. The distance to LWD sources, however, differ between stream channel types. The quantity of LWD in these pristine streams is high and is directly correlated with the abundance of salmonid habitat. This stream habitat sustains optimum egg-to-fry survival, provides nursery areas for juveniles, serves as overwintering refuge, and yields smolts (outmigrating juvenile salmon) which ultimately generate the adult salmon returns from the ocean.

Because the natural depletion rate of LWD resulting from decay, fragmentation, stream export, and other events is relatively high (1-3 percent per year), a continuous supply of wood from the riparian zone is needed to offset the natural loss and maintain salmonid habitat. If these streams are logged down to the streambank without leaving any buffer to replenish the natural loss of LWD, then we predict that the level of LWD will be reduced by at least 70 percent in 90 years. The abundance of rearing salmonids would likewise be reduced over a similar time. Recovery of LWD to the original pre-logging level from the regeneration of second-growth trees next to the stream would take about 250 years. Stream productivity would also be reduced during the period of regeneration and canopy closure. It is our opinion that, as a consequence, habitat and salmonid abundance would be significantly and irreparably damaged over this period of logging and recovery.

The riparian sources of LWD on tributary streams (streams used by only resident fish or those important for water quality) upstream of anadromous streams must also be protected because these streams contribute LWD and influence water quality in important downstream habitats. Buffer zones on these streams maintain the integrity of side slopes, streambanks, and stream channels and thus reduce the threat of landslides and debris torrents which can cause excessive downstream sedimentation. In essence, old growth riparian vegetation controls and maintains the natural integrity of a stream's characteristics critical to salmonid production.

Research has shown that clearcutting to the streambank without retaining an adequate zone of riparian vegetation adversely affects fish habitat, which in turn affects fish production on both a short- and long-term basis. Short-term (1-20 years) degradation of riparian habitat can result from increased sedimentation, altered temperature and streamflow regimes, and reduced quantity of LWD. Long-term degradation of habitat (20-200 years) can result from closure of the second-growth canopy, reduced input of LWD by the second-growth trees, changes in stream channel morphology, and chronic sedimentation from streambank erosion, landslides, and roads.

The NMFS policy advocates the use of a minimum 30-meter buffer on each side of all salmon streams and their tributaries as a recommended method of curtailing both short-term and long-term detrimental impacts on fish habitat from timber harvest. Land managers should recognize that the minimum 30-meter zone of riparian vegetation adjacent to salmon streams and tributaries represents the "out-of-stream" habitat required to protect and maintain "in-stream" habitat at optimum levels. NMFS established the 30-meter minimum because buffers less than 30 meters will not adequately maintain fish habitat. Buffers wider than 30 meters may be needed in some situations to protect the "minimum" from particular hazards such as blowdown, braided stream channels, or landslides.

The NMFS Policy of protecting the riparian habitat of all anadromous streams and their tributaries by retaining a minimum 30-meter no-harvest buffer zone applies to all Class I, most Class II, and a few Class III streams in southeast Alaska. These categories are defined as follows:

> Class I streams include any natural freshwater body of water (including lakes and ponds) containing anadromous fish or eggs or high value resident sport fish or with habitat having reasonable enhancement opportunities for anadromous fish.
>
> Class II includes streams, tributaries, and ponds with resident fish of limited sport value generally occurring in steep gradients or upstream of migration barriers.
>
> Class III streams are tributaries which do not have fish populations but have potential water quality influence on downstream habitat.

Class II streams are of great importance because they maintain water quality and supply LWD for downstream habitat in Class I streams. Class III streams which can significantly influence water quality on downstream Class I and II streams because of their size, or have high risk for side-slope and/or streambank failure, may require the protection of a full buffer zone.

We do not intend the Policy to apply to Class III tributaries which are either ephemeral (seasonal) or intermittent or have a gradient generally greater than 8 percent. In other words, the Policy does not apply to high gradient tributaries or storm drainages which do not have salmonids or do not have continuous flow. Also, it is not necessary to require buffer zones on Class II and III streams which do not flow into a Class I stream because they do not provide habitat for anadromous fish. These streams only require harvest according to best management practices to maintain water quality standards. The high gradient and storm channels which comprise the majority of Class III streams account for the greatest amount of acreage in a watershed.

In summary, research has demonstrated the importance of the riparian zone as fish habitat and that timber harvest within 30 meters of the streambank in this zone can cause long-term damage to salmonid habitat and production. The NMFS therefore, advocates retention of a minimum 30-meter no-harvest buffer zone along both sides of all anadromous fish (Class I) streams, most resident fish (Class II) streams, and a few significant water quality influence (Class III) streams in the forest of southeast Alaska. We are prepared also to assist in defining those Class II and III streams where buffer zones would be appropriate.

The NOAA policy would provide reliable protection of fish habitat during and after timber harvest. It would also set a bottom line that will facilitate decision making. The policy is relatively simple to apply. Protection of important anadromous streams would be far less compromised by lack of expertise, inadequate data, personnel or budget limitations, or competing interests. The minimum buffer standard would provide planners with an advance knowledge of harvest limitations. It would also provide an enforceable standard that lends itself to monitoring. The ease with which this standard can be implemented, monitored, and enforced should encourage compliance by managers and industry.

We do not view the timber retained in a buffer as "lost" from timber production, but rather, as timber required for fish habitat in the true sense of multiple-use. Commercial, recreational, and subsistence fisheries share the forest as a common base for their existence. Thus, we believe retaining a small but critical portion of the forest for production of fish is the basic precept of wise use and progressive stewardship of the land.

Mr. Chairman, this completes my prepared statement. I will be glad to answer any questions.

The **CHAIRMAN**. Thank you very much, Dr. Brooks.

Senator Wallop, did you have a statement that you wanted to make at this time?

STATEMENT OF HON. MALCOLM WALLOP, U.S. SENATOR FROM WYOMING

Senator **WALLOP**. Mr. Chairman, I do have a statement and, in order to save the time of the committee, I would like to submit it for the record. I would just say for the record now that it just distresses the hell out of me that we set up a forest planning process and then the environmental community uses it when it suits them and ignores it when it troubles them.

So the consequence is we spend a lot of money doing the forest planning process and then come to a conclusion like this: to throw all that away and all the knowledge gained from it in order to satisfy a few things which you, Dr. Brooks, you have testified in the opposite direction from when you worked for the Alaska Department of Fish and Game.

[The prepared statements of Senators Wallop and McClure follow:]

Statement of Senator Malcolm Wallop
Subcommittee on Public Lands, National Parks and Forests
Hearing on H.R. 987,
Provisions relating to fisheries protection and buffer zones
(Sec. 104(e)), and the designation of additional wilderness areas
on the Tongass National Forest (Title III)
February 26, 1990

Mr. Chairman, I would like to make a few remarks regarding the legislation pending before us.

I appreciate your scheduling this hearing to enable us to discuss the merits of mandatory buffer zones and the addition of wilderness areas within the Tongass National Forest.

I wholeheartedly agree with the Forest Service position that a single minimum-width buffer zone policy does not recognize the tremendous variability in site-specific conditions, nor the range of management options available to achieve overall management objectives including but not limited to enhancement of fish habitat and water quality.

Mr. Chairman, this Committee has a long standing tradition in honoring the views of the delegation from the State in which a land management decision is made. In most cases, the Committee has not moved forward with legislation until both Senators from that State are in agreement. In those very limited cases where the Committee has chosen to do otherwise, failure to pass a bill from the Senate has been the norm.

The Senators in this case are not advocating additional wilderness designations. There have been no hearings on these issues and most importantly, Alaskans have not had an opportunity to voice their opinions in a public forum. I keep hearing "operate the Tongass like all of the other National Forests." Well, I can advocate that position, but only if we do so in all respects. There's an irony here, Mr. Chairman: every year, conservationists howl about "interfering with Forest Service managers" when Congress recommends a nationwide timber sale program, and now they call for Congress to interfere with the forest planning process over wilderness recommendations and fish habitat enhancement. You just can't have it both ways. If Congress is going to consider additional wilderness designations, we must follow the same procedures and demand the same public input that we have in every other state where wilderness has been considered.

The economic viability of Southeast Alaska is dependent in large part upon sound multiple use management of this great National Forest. Consistent maneuvering to return to the table and the continued attempt to diminish the multiple use land base only erodes the economic progress made by the residents of this section of the country.

A case in point: Goldbelt, Inc., exhausted by continuing controversy and lack of funds to pursue further litigation, gave up on their Admiralty Island land selection in 1979. In exchange, they received the surface rights to timberlands around Hobart Bay and subsequently invested approximately $17 million along with the infrastructure necessary to support logging activity.

In 1979, wilderness advocates expressed no interest in the lands adjacent to Hobart Bay. But in 1990, two additional wilderness areas are now proposed which will drastically affect any logging activity that Goldbelt, Inc. had envisioned for their long-term economic viability.

People have the right to count on something. Both the Alaska Native Claims Settlement Act and the Alaska National Interest Lands Conservation Act were long-fought and complex measures. Agreement was reached, and even if it did not satisfy everyone, it was an agreement. I frankly am a little tired of agreements which only work one way. The entire delegation is opposed to this and I think we owe them that respect. If they decide to offer a land management bill, be it wilderness or otherwise, the Committee can work its will, as we should, and the delegation can either accept our judgment or await another day.

On a more personal note, Mr. Chairman, I am constantly amazed by the wilderness proponents. A clearcut using best Forest Service management practices is bad, but burning up more than 2 million acres of the Yellowstone ecosystem is good? It is this type of clear thinking that I find troublesome.

I simply fail to see how additional wilderness designations will benefit Southeast Alaska.

Thank you, Mr. Chairman.

Statement of Senator James A. McClure
Subcommittee on Public Lands, National Parks and Forests
Hearing on H.R. 987,
Provisions relating to fisheries protection and buffer zones
(Sec. 104(e)), and the designation of additional wilderness areas
on the Tongass National Forest (Title III)
February 26, 1990

Mr. Chairman, thank you for holding these hearings today on this most important subject, the House-passed Tongass reform legislation. Thank you also for so generously accommodating our schedules by moving this hearing from this morning to this afternoon.

There has been an enormous amount of attention given to the Tongass, and I think it is useful that the Committee has scheduled this hearing, as the issues raised by this legislation are contentious and extremely complex. I suspect the solution will be equally as contentious and complex.

There are a number of issues in the legislation before us that I would like to address.

First, there is a situation involving the critical need to maintain riparian habitat. The National Marine Fisheries Service has in the past stated, "Rather than relying on guidelines that have little flexibility from site to site, managers need to rely on the knowledge of foresters, engineers, hydrologists, wildlife and fishery biologists, and other disciplines as needed to tailor forest management operations to the constantly changing characteristics of the landscape and streamside areas."

I believed this to be enlightened management, as studies indicate that site specific management and in some cases removal of the canopy and introduction of certain amounts of sediment will enhance fisheries.

Well, as it turns out, what I considered enlightened management only means that the lights are on -- but no one is home.

If the Forest Service lacks expertise, inadequate data, or suffers from personnel or budget limitations, as the National Marine Fisheries Service now suggests, those specific issues should be addressed and resolved. But to come full circle and now advocate a policy to maintain a 100-foot buffer zone on Class I, II, and some Class III streams because the policy is relatively simple to apply, does not leave room to tailor Forest management operations to enhance the fishery or manage the entire riparian habitat.

If this Committee should choose to micro-manage this forest in this manner, I wonder how long it will be before we choose to pply the same standards to the Forest System in the lower 48 states.

The other issue which causes me great concern is the proposed addition of wilderness designations.

Opponents of Tongass reform legislation point to "The Compromise" which was struck during negotiations on ANILCA. They believe, as do I, that the timber provisions were included in ANILCA as a trade-off for the 5.4 million acres of new wilderness on the Tongass. I will not belabor this point, for I have spoken to this specific issue on numerous occasions and in more than a few hearings. I believe my record is very clear regarding my position on this matter.

The Tongass Land Management Plan is the nation's first Forest Plan to be revised. Since 1987, the cost of this effort to the taxpayer now totals $6,974,492.

As directed, the Forest Service has included a program of unprecedented public involvement. In addition, a most significant opportunity for public involvement will be available soon when the draft Environmental Impact Statement for the revised plan is released in June. This publication will display alternative choices for management and provide the public an opportunity to review and comment on all work completed in the revision process to date.

I fail to see any wisdom in designating additional wilderness areas prior to the release of the revised plan. The public has been and will be given the opportunity to have their voices heard and participate in the planning process. It is fundamentally wrong for us to circumvent the very process we mandated. One point I find particularly troublesome is the fact that if we choose to ignore the best available information from the professionals in Alaska, we set a clear precedent to ignore the entire planning process on forests in the lower 48 states. In short, I would sincerely like the opportunity to weigh and evaluate the findings of our Forest Service professionals before taking such Draconian action.

By waiting, Congress will still have the opportunity to ignore the findings in the revised plan, but at least it will have some understanding of the consequences of its action. In addition, we will at least maintain some of our credibility by utilizing the time, effort, and almost $7 million that we have thus far expended on the revision of TLMP.

Mr. Chairman, we have not designated lands as wilderness willy-nilly. While the Wilderness review by federal agencies has spurred the process in most states, and parenthetically brought effective management under final plans to a standstill throughout the West, that process has had public involvement long before legislation every reached the Congress. Agency hearings and informal work by the States and their delegations predates proposals. When I was Chairman, I did not wake up in the morning and decide that I wanted to get Senator Johnston's attention, so I would designate all the land I could in Louisiana as wilderness. If there are federal lands in Alaska which should be managed differently, then let the planning process work and let us respect the political process as well and defer to the delegation. Great Smokies Wilderness is just one example.

The Tennessee delegation could have had wilderness designation for the Tennessee portion any time it wanted. They insisted, however, on designations in North Carolina and agreement between the Senators representing that State could not be reached. The Senate acted properly and deferred action until both delegations could reach an agreement. Despite very serious misgivings, I have deferred to the Nevada delegation on wilderness and the Washington State delegation on North Cascades Wilderness on the subject of preemption of State law on water rights. Those were and are very serious concerns, but I deferred to the delegations. I see absolutely no justification for not deferring to the delegation from Alaska on fundamental land management decisions and to completely end run both the agency planning process and the basic local political process.

To date, there have been no public hearings on additional Tongass wilderness, no public forum, no opportunity to consider what Alaskans desire other than the revised planning process that the

Forest Service is currently conducting.

I am sure you are most cognizant that Alaskans are American citizens just as much as Californians, Idahoans, and Coloradans. They certainly should be afforded the same opportunities as the rest of the populace considering wilderness designations within their respective states.

Thank you, Mr. Chairman.

Dr. BROOKS. Oh, I beg your pardon, sir. The State of Alaska Department of Fish and Game during my watch and as far back as 1954 when I worked for the Territorial Department of Fish and Game, we have consistently recommended buffer strips.

Senator WALLOP. We will develop some of that during the questions.

Dr. BROOKS. Pardon?

Senator WALLOP. We will develop some of that during the questions.

The CHAIRMAN. Mr. Brooks, it has been suggested to us that within the 100-foot buffer zone that some selective harvesting of the pumpkins or money trees would actually enhance the quality of the Class I stream. I take it you do not agree with that?

Dr. BROOKS. Absolutely not. The scientific evidence suggests just the contrary.

There have been indications that opening up the canopy may create more food and warm the water, that will enhance the growth and survival of salmon and trout fry. But our studies have shown that, although this may happen, it is very ephemeral and the same fish will never winter over. The kind of environment that you have in the winter in such conditions is not conducive to survival. So you may create these fish in the summer, but you are going to—in that kind of an environment, you are not going to have them the next spring.

The CHAIRMAN. It seemed to me at least that that was the only real question on Class I streams. The width, the 100 feet, seemed to be pretty well agreed to by most people, and the only question seemed to be whether to harvest individual trees at the discretion of the foresters. And you come down clearly no.

Dr. Koski, do you agree with that?

Dr. KOSKI. I agree wholeheartedly with that, yes.

The CHAIRMAN. Is anybody here prepared to argue with that conclusion?

Mr. GIBBONS. Yes, Mr. Chairman, I would like to make a few comments in regard——

The CHAIRMAN. Yes, if you will state your name for the record.

Mr. GIBBONS. Dave Gibbons.

Some of the studies have shown, studying buffer strips, that the buffer strips studied—some were less than 100 feet and some were more than 100 feet, and the studies show that if you maintain existing habitat and you provide for future sources of large woody debris, that the production can be maintained or perhaps even increased.

So some of the research has shown that.

The CHAIRMAN. Well, you heard Mr. Brooks say that trying to apply a very complicated standard would overwhelm the fisheries people and would be difficult for the foresters to interpret out there in the field.

Is it not difficult to interpret those standards and make these decisions?

Mr. GIBBONS. Management of a stream is very complicated. No two streams are alike, and we have got 55,000 miles of stream. So what we have done is we have classified streams into like units.

So a stream may have ten or twelve like units within it. And we classified all of these streams, all 55,000 miles, and then we relate our prescriptions to the resources within those units.

When we first did that, it was very complicated. There was 38 different types of units across the forest. And so we have stepped back now and we have grouped these into nine groups, which is easier for management, and then the management relies on those nine groups, not the 38 groups.

We have got 25 trained fisheries biologists on the Tongass to work on this, and in my opinion I think we can manage that.

The CHAIRMAN. Mr. Koski?

Dr. KOSKI. Mr. Chairman, yes. Mr. Chairman, maintaining habitat while logging within that zone is nearly impossible. There are many, many factors in there, including large woody debris, maintaining temperatures, and solar radiation and stream sedimentation from the banks, and so on, that cannot be maintained if you log in that zone.

With woody debris, for example, that has a long-term impact on the system, requiring up to 250 years to recover.

The CHAIRMAN. Let me ask you the second question, which it seems to me is more difficult, regarding Class II streams. Mr. Brooks, you suggest that we have 100 feet buffers on most resident fish Class II streams and a few significant water quality influence Class III streams in the forest.

How would you suggest that we state that in the legislation?

Dr. BROOKS. The Class III streams do not contain fish.

The CHAIRMAN. I understand, but I am saying in the legislation, how do you suggest that we define how to protect Class II and Class III streams? Leave that to the Forest Service to decide?

We cannot put in the legislation "please protect most Class II streams." We have got to say all of a certain category or we have got to leave it to someone's discretion, and if so whose?

Dr. BROOKS. Any stream that is producing anadromous fish should be covered. These are all catalogued. There are official lists, published lists of anadromous fish streams on the Tongass.

The CHAIRMAN. Well, Class II, though, the definition is "includes streams, tributaries, and ponds with resident fish of limited sport value." I would take it that would be not anadromous fish. All anadromous fish are of sport value, are they not?

Dr. KOSKI. Yes.

The CHAIRMAN. "Generally occurring in steep gradients or upstream of migration barriers." That is Class II, and you say in your statement that you should protect most Class II, most resident fish Class II streams.

Is a resident fish Class II stream one with resident fish of limited sport value?

Dr. BROOKS. Many of those, sir, have considerable sport value. There are blockages in the stream—waterfalls, cataracts, and so on—that prevent the access of anadromous fish. But they may have very large populations of cutthroat trout, kokanec, rainbow, other species than salmon.

The CHAIRMAN. Would that not be Class I?

Dr. BROOKS. No, sir. The salmon streams, the anadromous streams, are Class I.

The **Chairman**. Class I streams includes any natural freshwater body of water containing anadromous fish or high value resident sports fish.

Dr. **Koski**. We will be able to add wording for legislation at a later time if you like. But also, let me comment on that.

In our definition of Class II streams, the proper buffer zone requirements would be that any Class II stream which runs or drains into a Class I would require a minimum 100-foot buffer zone.

Now, that excludes all those Class II's that dump directly into the sea or the ocean. The purpose again is to ensure maintenance of downstream habitats, the preservation of water quality prevent sedimentation, but maintain dissolved oxygen, temperature, et cetera.

The **Chairman**. Well, what do you do with Class II that drain into the ocean?

Dr. **Koski**. That is what I am saying. You may be misinterpreting me.

The **Chairman**. No protection for them, or leave it to the Forest Service?

Dr. **Koski**. The Class II's that dump directly into the ocean, what we are requiring is that the Forest Service utilize their best management practices, which require the maintenance of water quality standards.

The **Chairman**. And if they go into the anadromous fish streams?

Dr. **Koski**. If they go into a Class I stream, then we would require minimum 100-foot buffer zones. And there really are not that many Class II's in the forest. It is kind of a unique situation. They are either at the head of the watershed or they are in areas which Dr. Brooks is referring to with blockages and only have limitations to our resident species.

The **Chairman**. In Class III?

Dr. **Koski**. Class III streams, Class III streams are those streams which are only important from the stance of water quality. There are no fish utilizing these systems.

The **Chairman**. How do you suggest we protect them?

Dr. **Koski**. We would like to protect those streams. Those Class III streams also running, draining into a Class I, should require a 100-foot buffer zone. Now, there are exceptions to that in that those streams——

The **Chairman**. Same rule with Class II?

Dr. **Koski**. Same rule as with Class II.

Class III streams are typically your alpine, high mountain streams, and many of those streams are ephemeral, are intermittent or storm channels. They only flow in extremely high rains or storms.

In the majority of cases those streams do not need the 100-foot zone. They need BMP's, best management practices.

The **Chairman**. Even if, what if they flow into a Class I?

Dr. **Koski**. Regardless, they only need best management practices. If they are very high gradient, over eight percent, if they are ephemeral or intermittent, and they only flow during storm conditions, they do not require a 100-foot buffer.

We are requiring a 100-foot buffer on the main streams, the perennials which have high significant flow. Most of the streams like that are fairly good-sized. They are like five meters in width, channel width. And I would suggest here is where the site-specific prescription and the 24 fisheries biologists could be readily used to make a determination on the ground as to which one of those streams need the 100-foot buffer.

The CHAIRMAN. Well, we would like to see your language, and right away.

Dr. KOSKI. Okay, but I can sum it up again, in that the Class III's running into Class I's need a 100-foot buffer if they are perennial and have a significant downstream influence on Class I's. Those Class III's running directly into salt water require only best management practices.

The CHAIRMAN. Would anyone like to quarrel with those suggestions?

Mr. LEONARD. Well, we certainly do not believe that that is a necessary step in order to maintain the fishery capabilities of those streams. We think that in some cases 100 foot is simply not enough; in some places we must go further than that in order to maintain the fisheries proper.

In other cases we can operate closer than that, removing selective trees. In some cases we may want to add large woody debris to a particular stream course, deliberately add it to the stream course, in order to enhance the cover and what-not in that stream.

If we have the capability of operating in those streams, we could do that, again on the basis of a site-specific prescription.

We also have the problem that Alaska is an area of regular high winds and blowdown, blowdown of individual trees and of stands of trees, is a regular part of life in Alaska. And that includes within those riparian zones.

The CHAIRMAN. But I think Dr. Brooks was saying that the blowdown is helpful.

Mr. LEONARD. Ordinarily it would be. That is how those trees get into there. But if you blow down four or five acres in a batch and you have a legislative prohibition against getting in there, you can actually have a stream course totally blocked, and it will be blocked for a long period of time if you do not have the capability of going in there and removing that debris to a reasonable level to let fisheries through.

The CHAIRMAN. Now, would you be prepared to say what the effect of the kind of buffer zone that Dr. Brooks urges, what the effect would be on the timber harvest?

Mr. LEONARD. I will ask Mike Barton to address that.

Mr. BARTON. Yes, Mr. Chairman. We believe that the National Marine Fisheries Service policies outlined in the letter to Congressman Miller, I think in last July, would include about ten percent of the land in the timber base.

Now, I worded that carefully because we would under our practices and procedures, we would also include some of that same land with our existing policies.

The CHAIRMAN. I do not believe, by the way, you identified yourself.

Mr. BARTON. I am sorry. I am Michael Barton, the Regional Forester for the Forest Service in Alaska.

The CHAIRMAN. Well, what is the effect beyond the normal policies of his?

Mr. BARTON. Well, it could be as much as twice what our practices.

The CHAIRMAN. Five percent additional?

Mr. BARTON. Five percent additional, yes, sir. But it is difficult to tell because we do our practices on a site-specific basis, so there is some leeway in there.

Mr. LEONARD. Mr. Chairman, I might add that as we read the House-passed bill it would seem to require even greater impacts than are set forth in the National Marine Fisheries Service letter.

Mr. BARTON. That is correct.

The CHAIRMAN. Senator Murkowski?

Senator MURKOWSKI. Thank you, Mr. Chairman.

Dr. Brooks, there seems to be some confusion on the 100-foot buffer strips which you have indicated you feel are necessary for the Class III flowing into Class I, and I believe it is generally understood that Class III—there is no other class than III; that is the one that comes off the alpine, it is perhaps dry in the summertime, in the wintertime it may be frozen, there may not be much water coming off.

And your concern is, I assume, the muddying that would occur if logging took place in a drainage of a Class III, and then that washing down into a Class I, is that correct?

Dr. BROOKS. Yes, sir, that can happen.

Senator MURKOWSKI. That is your concern?

Dr. BROOKS. We are not that concerned about a 100-foot buffer strip on a lot of the Class III streams. We certainly would defer to the judgment of the Forest Service.

Senator MURKOWSKI. You would defer to the judgment of the Forest Service on Class III?

Dr. BROOKS. Absolutely, on the Class III's. They have water quality standards that must be protected and those generally will suffice for our concerns regarding water quality downstream.

Senator MURKOWSKI. If I could put it another way, then, I assume that you would just leave it up to the Forest Service to set standards on III?

Dr. BROOKS. Some of our scientists would like to go further, but, being realistic about it, most of the timber that would be reserved through a buffer strip program would involve Class III streams, and there have been calculations made that to protect all the Class III streams might tie up as much as 40 percent of the timber.

Well, that is unreasonable. We are not proposing anything of that sort. We are asking that where there are particularly sensitive Class III streams that could, through instability, landslides, create serious sedimentation problems downstream, that certainly extra care be taken there, and perhaps in many cases that would be a 100-foot leave strip. If not, then best management practices should determine it.

Senator MURKOWSKI. I assume that in many cases, if you have some logging on a Class III area and there is sedimentation, that as a consequence of the infrequency of the water flowing, that the sediment may or may not reach the Class I stream?

Dr. Brooks. That is true.

Senator Murkowski. I am sorry?

Dr. Brooks. Yes, sir.

Senator Murkowski. So your bottom line is on those in question, leave it up to best forest management practices in Class III streams?

Dr. Brooks. Yes, sir, I think that is a fair statement.

Senator Murkowski. Thank you.

Dr. Brooks. Although my colleague, Dr. Koski, would seek something more than that.

Senator Murkowski. Well, I understand that, and there are many who would seek no timber cut at all. So I guess we have to stop somewhere.

Dr. Koski. May I comment on that, please, Senator Murkowski?

Senator Murkowski. If you wish.

Dr. Koski. In Dr. Brooks' comments, and he has outlined them properly, there are a vast amount of Class III type streams in the area, and they account for a large volume of the area, and that is why the percentage that the Forest Service and the industry has shown can take a lot of timber out, timber lost to the industry or to the cut.

But let me point out that many of those type III streams are still of a size that can have a significant downstream impact, and it is extremely important that we have adequate protection for those streams, and the NMFS policy is to advocate a 100-foot minimum buffer on those streams.

Again, let me say the majority do not fall in that classification. Most of those require BMP's. And we have set out some guidelines in our July 28, 1989, letter from James W. Brennan to Representative George Miller, stating that any of those streams over eight percent gradient, which are ephemeral or intermittent, do not require a buffer.

I would also like to point out that a considerable amount of research has been done by researchers in the Northwest and Alaska and British Columbia, Oregon and Washington, and they have shown that these alpine streams, these high gradient streams, are the source of much of the sedimentation, through debris torrents, which can really raise havoc with habitat.

They can destroy much of the spawning and rearing habitat through landslides and sedimentation, and the reason for this is because there is a lot of woody debris i.e., logging slash, that was left in the stream and not enough trees for protecting the stream bank or side slopes, which can cause unstable conditions.

Senator Murkowski. I assume that you, as I, have seen the damage done by blowdowns, where you get a Thanksgiving wind that occurs in Juneau maybe every ten years, and you get these huge areas on the exposed slopes and down in the valleys where the wind concentrates and you get all that timber into the creek, and you get mudslides associated with that and any number of things that obviously have a devastating effect on the stream.

More often than not, I assume, if there is any logging in the area, the loggers are called upon to pull the debris out of the stream and try and open up the stream.

Then we have that narrow area where we have the streams continually undercutting alongside the creeks and the logs falling in, and it makes a natural habitat. So obviously there is a balance going on here, and I assume through proper forest management practices, working with the fisheries people, that you can maintain a reasonable balance, recognizing you have got a habitat to concern yourself with, as well as the ability to enhance that habitat.

It is my understanding that the Forest Service takes pride in the rehabilitation that they have been able to contribute to the various streams in southeastern Alaska. I wonder, Mr. Chairman, if Mr. Barton could comment a little bit on how forest management practices have led to the enhancement of certain streams.

I believe that there are fish ladders that have been put in in conjunction with the Department of Fish and Game, as well as U.S. Fish and Wildlife Service, and other concentrated efforts for enhancement.

Dr. KOSKI. May I finish my comments on your question? There was about a dozen questions there and I would like to respond to a couple.

Senator MURKOWSKI. I requested Mr. Barton to respond.

Mr. BARTON. Mr. Chairman, we do have quite an active fisheries enhancement program on the Tongass: fish ladders to get around obstacles, removal of barriers in the streams to allow fish passage, some fertilization projects.

Senator MURKOWSKI. I am sorry, I cannot hear you, Mr. Barton. Would you pull that microphone up closer. Thank you.

Mr. BARTON. Sorry, Senator.

We do have a very active fisheries enhancement program on the Tongass. We have removed barriers to fish passage, built fish ladders, had lake fertilization, stream fertilization programs to increase the basic productivity.

Since 1980, we have invested in fisheries enhancement projects that have a potential to produce about eight million pounds, an increase of eight million pounds annually of salmon. So we are quite proud of our fisheries enhancement efforts.

Senator MURKOWSKI. I am told that there is the potential of producing seven to eight million pounds additional fish as a consequence of your efforts?

Mr. BARTON. The projects that we have undertaken in the last few years have produced that much. There are opportunities to produce much more, too, as we have outlined in our study and through our revision process.

Senator MURKOWSKI. Can you do a fisheries enhancement in a watershed if it is not logged?

Mr. BARTON. Yes, we can and have.

Senator MURKOWSKI. Do you?

Mr. BARTON. Yes, we certainly have. We have also used receipts, timber sale receipts, to build fisheries projects. The Knudsen-Vandenberg Act allows us to do that.

Mr. LEONARD. And those Knudsen-Vandenberg projects are limited to areas where we have had timber sales.

Senator MURKOWSKI. How about wilderness areas? Can you do a fisheries enhancement project in areas where you do not have any roads?

Mr. LEONARD. No, we cannot.

Senator MURKOWSKI. So what happens in a wilderness area? No fisheries enhancement?

Mr. LEONARD. No fisheries enhancement in a classified wilderness area.

Senator MURKOWSKI. Trees go down and whatever happens happens?

Mr. LEONARD. It is left to carry on the natural course.

[Subsequent to the hearing the Department of Agriculture submitted the following:]

United States Department of Agriculture
Forest Service
Washington Office
12th & Independence SW
P.O. Box 96090
Washington, DC 20090-6090

Reply To: 1510

Date: APR 10 1990

Honorable Dale Bumpers
Chairman, Subcommittee on Public
Lands, National Parks and Forests
Committee on Energy and Natural Resources
United States Senate
Washington, D.C. 20510

Dear Mr. Chairman:

We have reviewed the transcript from the February 26 hearing on H.R. 987, the "Tongass Timber Reform Act." A brief discussion between Senator Murkowski and Associate Chief Leonard concerning fisheries enhancement in designated wilderness appears on page 44 of the transcript. We would like to clarify our responses during that discussion.

The Wilderness Act generally prohibits roads, motorized equipment, structures, and installations within areas designated as wilderness under the Act. These prohibitions preclude fisheries enhancement projects in wilderness.

However, such projects are permitted within National Forest wilderness and wilderness study areas in Alaska. Section 1315(b) of the Alaska National Interest Lands Conservation Act (ANILCA) permits fishery research, management, enhancement, and rehabilitation within wilderness designated by ANILCA. Reasonable access, including the temporary use of motorized equipment, as well as permanent improvements and facilities such as fishways, fish weirs, fish ladders, fish hatcheries, spawning channels, stream clearance, and egg planting are permitted.

We are sending a copy of this letter to Senator Murkowski for his information. We are also sending a copy to Mr. Al Astrin, printing editor for the Committee on Energy and Natural Resources, with the request that this letter be inserted at an appropriate place in the hearing transcript.

Sincerely,

MARK A. REIMERS

for F. DALE ROBERTSON
Chief

cc: Senator Murkowski
Mr. Astrin w/ transcript ✓

Caring for the Land and Serving People

FS-6200-28(4/88)

Senator MURKOWSKI. Mr. Leonard, at page 5 of your testimony you correctly point out that the original TLMP was used by Congress for Alaska National Interest Lands Conservation Act land designations in southeastern Alaska, and the TLMP could be used by the Congress now.

Could this committee have the draft TLMP alternatives, including your maps, for use in its land proposals, and when could you get them to us?

Mr. LEONARD. Yes, Senator Murkowski, we could make those available to this committee about the third or fourth week in March.

Senator MURKOWSKI. At page 5 of the testimony which has been given in advance, the SEACC group says that the KPC 1989-1994 FEIS shows the following declines by the year 2054. They show a 56 percent decline in bald eagles, a 58 percent decline in Sitka black-tailed deer, a 59 percent decline in pine marten, a 39 percent decline in black bear, 45 percent decline in river otters. And I am not sure we had them, but I guess we do: a 69 percent decline in hairy woodpeckers.

Can you comment?

Mr. LEONARD. I will ask Regional Forester Barton to respond to that.

Mr. BARTON. Yes, sir. Those are worst case analyses. That is a decline in habitat, not necessarily population. There are a lot of factors that enter into the actual populations and any impacts on those.

One of the things we desperately need in Alaska are population objectives for various species. We continue to pursue that.

But that assumes that the harvesting, those projections assume, that the harvesting would continue at the same intensity until 2054. It assumes that our practices and guidelines, our protective practices and guidelines, are not followed.

It only deals with the localized area. It is not a generalized projection, but it is a projection for the area involved in the impact statement.

Senator MURKOWSKI. Mr. Chairman, I have got a lot more questions, but obviously we want to move on to accommodate the other panel. I am wondering if we may submit questions to the panel, as a consequence of the time, and have them back by whatever time you set.

The CHAIRMAN. We would like to go to markup probably next week, so there would have to be a fairly quick turn-around. But could the witnesses get us written answers by next week?

Mr. LEONARD. Assuming we get the questions right away, we will get responses right away.

Senator MURKOWSKI. Thank you, Mr. Chairman.

The CHAIRMAN. Senator Wallop.

Senator WALLOP. Mr. Chairman, thank you.

I have got to say I'm again a little distracted that you go to markup before you have the forest plan. I have got to say that Congress put that in place working with the environmental community, working with the Forest Service. It was a plan, it was a process, by which all of us were supposed to know what to do on the forest.

Here we are saying we know better under all circumstances. And from the standpoint of management, I guess I would say that that was unwise. I hope to develop a little of that right now.

Dr. Brooks, prior to becoming Deputy Director of the Alaska Region of the National Marine Fisheries, were you not the Commissioner of the Alaska Department of Fish and Game?

Dr. BROOKS. Yes, sir.

Senator WALLOP. And in that capacity, did you or did Alaska Fish and Game advocate 100-foot buffer strips on Class I, Class II?

Dr. BROOKS. We advocated buffer strips without a specific measure being recommended or designated.

Senator WALLOP. But in fact, at the time were you not advocating the necessity of keeping all woody debris, large and small, out of such streams and hand-cleaning?

Dr. BROOKS. No, sir, and I just do not know where that allegation originated. I have heard it many times. It certainly was not and has never been to my knowledge a position of the Department of Fish and Game.

Senator WALLOP. You did not do any hand-cleaning of streams for large woody debris?

Dr. BROOKS. No, sir.

Senator WALLOP. Ever?

Dr. BROOKS. No, sir, not to my knowledge, except one or two cases where the operator was using the stream as a skidway for logs and had pretty well boogered things up; we did require him to straighten it up.

Senator WALLOP. Would you say that the attention of the Forest Service to riparian management has improved or gotten worse?

Dr. BROOKS. I think it has improved and, as I say, I certainly compliment the present leadership of the Forest Service in their attitude toward recognizing the multiple resource values in the forest. I think it is very much improved, yes, sir. But I also point out that people change, circumstances change. And where you leave it to a subjective decision of an individual, you cannot always be certain—in fact, given enough time you can be very certain that the right decisions are not going to always be made.

Senator WALLOP. In fact, is this not a subjective decision, and is this not going to be rigid and beyond reach? Under all sets of circumstances, you are going to sit here and say that there is no time in which the judgment of on the ground land managers can be brought into play.

Dr. BROOKS. They need to be brought into play continuously, but the 100-foot leave strip is the minimum. We have never found a location where we could safely say you can intrude on the 100-foot without any risk of downstream damage. Nor have we ever found a place where we have had too much woody debris. We have had too much for canoeing, quite true, but we have never found where the relationship between more woody debris and more salmon production broke down.

Senator WALLOP. I have not really looked at that, either.

I think on page 1 and 2 of your testimony you cite that there is extensive research documenting the need for the 100-foot buffer strip policy. That is what your statement says, is that correct?

Dr. Brooks. Research has led us to the conclusion that a 100-foot is the minimum needed, and in connection with that there should not be any salvage operations within the 100-foot.

Senator Wallop. But you cite extensive research.

Dr. Brooks. Yes, sir.

Senator Wallop. But in response to a February of this year Freedom of Information Act request for that research, you produced an eleven-page 1986 article which appeared in the Canadian Journal of Fisheries and an article accepted for publication, but not yet published, and that was it.

That is hardly extensive research.

Dr. Brooks. Mr. Chairman, I would like to refer that to Dr. Koski.

Dr. Koski. That Freedom of Information Act did not request all the printed information on the buffer zone issue. We submitted the two documents that we thought were most pertinent.

If you look at our policy statement, it says research done in Alaska, and we cite six references in our policy statement. We also refer to other research on the outside. And if you are familiar with the research in the Pacific Northwest, you realize that there is a considerable amount of research which talks about buffer zones and the need or utility for buffer zones for protection of stream habitats. Many of those are referring to different zones, many of them referring to a 30 meter classification.

We did submit two different Freedom of Information requests, and one of them was a little bit more detailed than the other. But basically, we submitted information we had on our research.

But I am saying there is additional information outside of our research that supports the NMFS policy.

Senator Wallop. It is a pity you did not supply it.

Dr. Koski. Well, again, we were not asked for everyone's research. We were asked for what we did and what we had, and we submitted our policy, which had references to six. And then we submitted the two most pertinent ones, the 1986 research by Murphy et al.——

Senator Wallop. In fact what you are saying, you did the absolute minimum necessary, relying on not the research, but your just statement that it exists.

Dr. Koski. I do not think we did the absolute minimum. We gave you the most important two pieces, and that was with cross-references.

Senator Wallop. One was an article that has not been published and one that is hardly the most important, just by your own response to this question.

Dr. Koski. Well, the 1986 article is a very important document. The one in press has been accepted, peer reviewed, and will be appearing this year. So for all practical purposes it has been accepted and published.

Senator Wallop. Well, on page 2 of that same testimony, Dr. Brooks, you claim to have worked closely with the Forest Service in this area.

Dr. Brooks. Yes, sir.

Senator Wallop. And yet the September 15th, 1989, letter to Dr. John Knauss, from the Chief of the Forest Service, invites "the increased participation of the National Marine Fisheries Service in the field evaluations and analyses associated with selecting management prescriptions for streamside zones and in follow-up evaluations to check whether the expected results were achieved following project completion."

The question I have is, are your people getting out on the ground and looking at what the Forest Service is doing, or do you want this buffer strip policy because you just do not have sufficient personnel to get out and monitor their activities?

Dr. BROOKS. Both. Both of your questions I think I would answer in the affirmative. We do have people out in the field working with the Forest Service. We do not have enough to monitor all of the activities and the effects of logging.

Senator WALLOP. So one of the things we are trying to do here is to put the blanket solution down that does not have necessarily a scientific basis, but a convenience basis?

Dr. BROOKS. The 100-foot strip, of course, is arbitrary. One could say 90 feet or 120 feet or 85 feet. It seemed like a number that would be easily understood and interpreted and manageable by people in the field.

Senator WALLOP. Well, in fact what you have just said is what I think all of us have been saying. The response to that question is that there are different circumstances along different stream banks which, when subjected to judgment, would come up with a different conclusion.

What you are doing is denying us that conclusion, simply by putting down a blanket solution to it. And I think my plea and that of Senator Murkowski and that of others, is that this process of site-specific management undergoing the forest management planning process, which is the law of the land, is probably better than some blanket solution which you're advocating here for convenience, both on the level of personnel and, by your own response to the last question, there are times when better things could be done.

Dr. BROOKS. Senator, I do not want to indulge in doublespeak. I told you that, on the basis of our scientific studies, we had not found any reason to conclude that a buffer strip of less than 100 feet would assure long-term adequate protection. What we have said is that we may well have to go much beyond 100 feet to achieve the desired protection, but 100 feet is something that most anyone can measure. It does take some of the subjectivity out of it. But remember that the people out there with the chainsaws looking at the stream are each going to make a different estimate of how many trees they should leave along the stream. And if you have a minimum that you know is going to provide an acceptable level of protection, you have got a good base to work from. Use discretion and good judgment beyond that.

Senator WALLOP. Well, in your letter of last year, or not yours but Dr. Krauss's letter to Dale Robertson on December 13th, that letter would appear to say that National Marine Fisheries Service agrees that site-specific management is best, but it just does not trust the Forest Service to implement it.

I quote from the letter. Your letter states that:

The Forest Service requires a no-harvest buffer zone along streams when needed to maintain or enhance fish habitat and maintain water quality, the width of the buffer to be dependent on the on-site conditions.

NMFS agrees that site-specific evaluations are theoretically the best way to manage streamside zones. In reality, however, the Forest Service policy fails because it is too complex and relies on too many people variously interpreting Forest Service guidance to protect riparian vegetation.

In fact what you have said is that site-specific management is best, but you just do not trust anybody. That is the process. Congress goes through this process, working with people of the best of intentions to develop a planning mechanism into which there is public input, to which there is the whole process which has been set up for it. And you are coming along and saying, now set that aside, do not use your brains within this element, and just lay down some kind of a permanent solution.

Twice now you have answered that site-specific would be better or site-specific would lend itself to judgments that the blanket conclusion does not. I am just saying, you know, that it seems to me that it is a very big shame when this country comes down to the fact that management is based on blanket prescriptions which do not allow the intellectual process of land managers to come into play.

You have substantial increases in fish harvests without these buffer zones, do you not? I mean, you have record fish runs. In 1983, eight million fish a year were being caught. Recent statistics show that 30 million are now being caught. It is a fourfold increase.

It is not as though it looks as though things are in danger.

Dr. BROOKS. Senator, we have had ups and downs in our fisheries. In the early 1970's we had essentially no fishing in southeastern Alaska because of the failure of the salmon run. Management, environmental conditions, weather conditions, largely determine the production of salmon.

Senator WALLOP. And driftnets.

Dr. BROOKS. But I think that most anyone will concede that there is a relationship between the quality of salmon habitat and the production of salmon.

Senator WALLOP. There is no argument from me on that. The argument from me is whether there is a universally improved habitat without the action or thoughts of man in the planning process.

You seem to be saying that it is so. I seem to think that man can do a pretty good job and it has been demonstrated.

Dr. BROOKS. Senator, let me say, if in the judgment of the Senate you do not feel, or the Congress, you do not feel that you need to assure a 100-foot buffer strip in the interest of protecting salmon habitat and salmon production, then what do you think the people on the ground, the timber-oriented people, the people who quite properly are seeking to maximize profits—when they look at those pumpkins along there, what is their decision going to be? The Congress said we could take them.

Senator WALLOP. I did not think that the people in the business had that decision. That is the whole point of this thing. The Forest Service sitting right here and the planning process and the public comment period are what makes that decision.

It is not a decision of a guy with a chainsaw. It is a decision of what is allowed in the cut.

Are you going to extend this policy—would you recommend that this policy be extended to the Lower 48?

Dr. BROOKS. Well, I left the Lower 48 and went to Alaska because I did not like what I was seeing in the Lower 48. I came from the State of Michigan, where when I was old enough to realize it there were some 16 acres of virgin white pines left in the whole State.

Senator WALLOP. That does not answer my question. My question was do you think you would recommend this policy to the Lower 48?

Dr. BROOKS. It depends on the situation, Senator.

Senator WALLOP. Once again we are getting back to the very same conclusion, that the situation is the thing which ought to drive the process, not some blanket conclusion as we sit here in a room that is 100 miles from any forest and anadromous stream.

Dr. BROOKS. If your objective is to protect salmon habitat, then I would recommend it to people in the Lower 48, yes.

Senator WALLOP. Thank you, Mr. Chairman.

Dr. KOSKI. Senator.

The CHAIRMAN. Thank you very much.

I think Dr. Koski wanted to make a very brief comment. Then we have got another five witnesses after this. Obviously we have not exhausted all the questions, but very briefly, Dr. Koski.

Dr. KOSKI. Thank you, Senator.

I would just like to make a little bit of a clarification. The minimum 30 meter zone is based on scientific evidence and I will be glad to supply you with all the evidence that supports that.

There is a misinformation or misconcept. Now, the 30 meter zone, the minimum 30 meter zone, is a fish habitat. It is fish habitat. It is very important to the stream habitat. What we are advocating is that that zone be kind of like a bottom line and the Federal forest managers are able to use that and make recommendations for site-specifics to extend that if necessary in some cases.

In cases where there is wind-throw potential, shallow soils, greater channels, et cetera, you there would have a much wider zone, and that is where your specialist would make that recommendation.

But what we are saying in essence is there is a minimum zone to supply fish habitat, and that applies to all the drainages within southeast Alaska. To carry that another step further——

The CHAIRMAN. Why don't you submit that to us in writing.

Dr. KOSKI. I will, sir.

Senator WALLOP. Mr. Chairman, when he is submitting, I would ask him to submit any studies that may have been done where on occasion the changes in riparian habitat may in fact enhance——

Dr. KOSKI. Well, I would love to comment on that, but I never had a chance to. There has never been a documentation in Alaska or anywhere else that I know of that logging has been used to enhance fish habitat

Senator WALLOP. I did not say logging.

Dr. KOSKI. What are you asking for then, sir?

Senator WALLOP. Changes in the riparian habitat.

Dr. KOSKI. Changes to the riparian habitat.

Senator WALLOP. Man-created.

Dr. KOSKI. Man-created.

Senator WALLOP. In fact, one of the things that—well, you can chuckle all you like, but one of the things that you do in changing the riparian habitat is enhance the fishery, which we have just been told on occasion that the Forest Service planning process and mechanisms have undertaken, with success.

The CHAIRMAN. Now that we have such agreement between the witnesses——

[Laughter.]

Senator MURKOWSKI. Mr. Chairman, very briefly, I would like the record to note that the Southeast Conference in its last meeting communicated, as a consequence of an eleven to zero vote, a recommendation that the matter of buffer strips be left up to the National Marine Fisheries Service and to respond to the appropriate Tongass land management plan in conjunction with the Forest Service, to address this issue.

So that probably is the consensus of Alaskans speaking through that organization.

I would again ask that the record show the southeast Alaska salmon harvest levels and the notation that in 1985 and 1986, at which time there was a modest decrease, it is believed to have been a factor from the driftnet fishery of Korea, Taiwan, and Japan. 1987 and 1988 show an increase.

Thank you, Mr. Chairman.

The CHAIRMAN. Thank you, Senator Murkowski.

Ladies and gentlemen of the panel, let me say that, while more information would clearly help us, we simply cannot wait until June to begin to go to our markup. For one thing, I think we would likely lose control of the legislation if that happened.

Someone would put in a non-germane amendment on the floor, and then we really would be flying blind because that would be no place to make the fine judgments which we can make in committee.

So we simply cannot wait on that. By the time it comes out in June, I would hope that we could then use that information in conference.

But I would urge you to be particularly specific in such supplemental comments as you wish. As you can see, we are particuarly interested in Class II and Class III streams. That is a very sharp focus of what we would like to hear from you, because we are talking about drawing up this legislation now and we will need that information.

So thank you very much. We appreciate your testimony.

Next we have a disparate panel, including: Craig Lindh, Project Analyst for the State of Alaska; Richard M. Griffin with the Southeast Conference; K.J. Metcalf, Vice President for Southeast Alaska Conservation Council; Don Finney, General Manager of Alaskan Loggers Association; Kathryn Troll, Executive Director of the Southeast Alaska Seiners Association; and Joseph Wilson, President of Goldbelt, Incorporated.

Senator MURKOWSKI. Mr. Chairman, Senator McClure has an extensive statement for the record. He is unavoidably detained at a clean air hearing or a clean air debate and markup or discussion, or any of the above, and regrets that he cannot be here.

But he intends to be here as soon as he can.

The **Chairman**. Without objection, his statement will be put in the record and duly noted the reason for his absence.[*] So let us begin with Mr. Lindh.

STATEMENT OF CRAIG LINDH, PROJECT ANALYST, OFFICE OF THE GOVERNOR, STATE OF ALASKA, ACCOMPANIED BY DR. DAVID ANDERSON, DEPARTMENT OF FISH AND GAME

Mr. **Lindh**. Thank you, Mr. Chairman and members of the committee.

I am Craig Lindh. I represent the State of Alaska and I am in the Governor's Office in Juneau. Accompanying me today is Dr. Dave Anderson of the Department of Fish and Game for the State of Alaska. He is here to answer any technical questions which may come up regarding State fish and wildlife resources and the Tongass Forest.

I would just like to summarize briefly the testimony which you have, the written testimony. As this committee knows, Governor Cooper last year in Sitka testified in opposition to all of the bills currently pending before the Senate and various features of those bills and, rather, endorsed the adoption of a compromise which had been developed by a committee of elected officials from municipal governments throughout Southeast Alaska.

I guess I could summarize briefly the key elements of that compromise. The Secretary of Agriculture would have the discretion to set the timber supply based on economic conditions, the planning process, et cetera;

That there would be a $15 million or more annual appropriation to finance intensive forest management in the forest, such as precommercial thinning;

There would be the designation of twelve areas important to local communities, not wilderness, but rather a no-cut designation;

That there be modifications, rather than cancellation, of the two long-term contracts;

And finally, that there be an economic diversification program established to help communities in the transition period.

Today we are focusing on stream buffers and the designated areas. Regarding stream buffers, the minimum 100-foot mandatory no-cut buffers which have been discussed here at some length, we understand that in the negotiations last fall that key conferees were quite close to an agreement on the question of stream buffers.

Nothing came of it, but we understand that there was close to consensus on the notion that these buffers be provided on all anadromous and high value resident fish streams in the Tongass. And I would rather not get into the Class I, II, III because I do not think that is terribly helpful for understanding.

The **Chairman**. Into the Class I, you say?

Mr. **Lindh**. I say I would rather just refer to the streams in terms of their fish-bearing capacity, anadromous and high value resident fish streams.

The **Chairman**. Rather than the classing?

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[*] The prepared statement of Senator McClure appears on page 82.

Mr. **Lindh**. I think that is a helpful administrative tool, but I do not think it really has much business in legislative language. That is my personal judgment.

The **Chairman**. You mean we should not provide for buffer zones?

Mr. **Lindh**. No, no. Let me continue.

It was our understanding that there was close to agreement on the mandatory no-cut buffers, and the State now would not object to that being incorporated in Tongass legislation. We believe that that approach would be simple for everybody to understand and implement.

Everybody can run a tape measure. It is kind of like a 55 mile an hour speed limit; everybody understands what it is. It does provide a minimum level of protection, which we believe has some basis in scientific evidence.

The **Chairman**. But the agreement was with reference to classes and defining the classes. Are you saying there is difficulty in defining?

Mr. **Lindh**. Well, it is my understanding that there is a discrepancy between what Class I was in those discussions last year and the Class I, II, III scheme that's been discussed here today. And perhaps that is an illusion. Maybe I am confused.

But rather than get into a technical discussion about what those classes mean, it is our understanding that the application of stream buffers to all anadromous fish streams and high value resident fish streams would provide the kind of protection that——

The **Chairman**. Well, I think that the Forest Service has the streams classed right now all over the Tongass.

Mr. **Lindh**. That is correct.

The **Chairman**. Everybody knows what we are talking about when we talk about I, II, and III, do they not? Or is there any difference in that?

Mr. **Lindh**. I think people that are close to the subject do understand, there is no question about that.

Then I would also like to say that, regarding the land designations, in the Governor's testimony last year it was clear that the State is not supportive of additional wilderness areas to be designated in southeast Alaska. However, we do believe that it is really time to recognize the concerns of some of the smaller communities that are finding these areas close by to be important to them for subsistence, sport, and fish hunting, very important resource values.

We have done our own, taken our own look at some of these areas and concur with the high resource values that have been identified by the communities, and we do continue to support the compromise proposal which was advanced last March by the Southeast Conference.

We believe that it is probably the best we are ever going to get in the area of a compromise representing the diverse interests of southeast Alaska.

So with that, I will conclude my remarks, and if you have any questions of Dr. Anderson.

[The prepared statement of Mr. Lindh follows:]

TESTIMONY OF CRAIG J. LINDH
BEFORE THE
SENATE COMMITTEE ON ENERGY AND NATURAL RESOURCES
February 26, 1990

Mr. Chairman and Members of the Committee:

My name is Craig Lindh. I am employed by the Office of Governmental Coordination for the State of Alaska. On behalf of Governor Cowper, I want to thank you for the opportunity to present the views of the State of Alaska on legislative proposals affecting management of the Tongass National Forest. It is my understanding that this hearing focuses on mandatory stream buffers and land designations within the Tongass National Forest. My testimony is limited to those two topics.

In testimony before this committee last April, Governor Cowper announced the State's support of an alternative to the Tongass bills currently pending before Congress. This alternative would adopt a compromise developed last year by a committee of local elected officials representing a cross-section of Southeast Alaska communities. This effort by mayors and city council members was sponsored by the Southeast Conference, a regional organization of municipal and business representatives. The compromise proposal was formally adopted by the Conference last March. The Southeast Conference addressed the issue of Tongass reform by looking at underlying community interests--economic, environmental and social. While neither perfect nor unanimously supported, this unprecedented compromise comes closer to satisfying the concerns of a majority of affected Alaskans than any other alternative.

For this reason, the State of Alaska continues to support key elements of the original Southeast Conference package. They include:

-secretarial discretion in establishing a periodic timber supply yearly appropriation of up to $15 million for intensive forest management;

-permanent protection from commercial timber harvesting for 12 areas identified by communities;

-creation of a $20 million economic diversification program;

-modification, rather than cancellation, of the two long-term timber sale contracts.

STREAM BUFFERS

It is our understanding that participants in last November's Tongass negotiations agreed to mandatory 100-foot no-cut buffers along both sides of all anadromous and high value resident fish streams. The State of Alaska does not object to this approach. It would ensure a minimum level of protection for important fish streams in the Tongass Forest, and would be easy for all to understand and implement. This approach would have relatively little impact on available timber volumes when compared to site-specific best management practices of the Forest Service, and would lay to rest an increasingly contentious issue in southeast Alaska. It should be noted, however, that the Southeast Conference did not address this issue.

LAND DESIGNATIONS

In 1980, Congress designated over 5.5 million acres of Tongass wilderness in an attempt to balance two national interests: the preservation of pristine areas of southeast Alaska and the preservation of jobs in the Tongass timber industry. As we have seen over the past 10 years, the solution did not take into account the complex concerns and interests of many small communities in Southeast.

The Southeast Conference compromise proposal recommends a legislative no-cut designation of 12 areas rather than wilderness designation. This reflects the desire to protect forested areas from commercial logging while retaining opportunities for other activities which are important to local people. Areas which would receive special permanent protection are: Kadashan River, Chuck River and Windham Bay, Yakutat Forelands, Lisianski and Upper Hoonah Sound, Nutkwa River, Karta River, Mt. Calder and Mt. Holbrook, Young Lake Outside Islands, Trap Bay, Goose Flats, and Berners Bay. These special areas have been identified by communities as particularly important to them for subsistence, sport, and commercial fishing, and the harvest of wildlife for subsistence and sport. These high values are confirmed by our Department of Fish and Game.

The State of Alaska encourages this committee to consider adopting the original Southeast compromise proposal rather than enacting legislation which is unlikely to end the conflict over the Tongass National Forest. The proposal not only reflects a resolution of many issues of local concern, but addresses these concerns in a manner which furthers the national interest in true multiple use management of the National Forest. The State of Alaska believes that this compromise is not only the best hope of settling differences that divide the people of southeast Alaska, but addresses the national interest in the Tongass as well. The original compromise comes closer to satisfying the concerns of a majority of affected Alaskans than any other proposal, including pending legislation and changes adopted in early February by the board of directors of the Southeast Conference. We urge you to seek adoption of the key elements of the original compromise in final Congressional action this year on Tongass legislation.

Although there are many similarities between the original Southeast Conference proposal and its successor, the significant geographical differences, coupled with the reaction of local communities have led the State of Alaska to conclude that the first approach is better. We urge you to seek adoption of the key elements of the original compromise in final Congressional action this year on Tongass legislation.

In an effort to assist the Committee in its deliberations, I am submitting for the record a resource analysis of the revised Southeast Conference's Tongass proposal done by the Alaska Department of Fish and Game. I am also submitting a compendium of the recent letters we have received discussing the Southeast Conference.

Thank you for this opportunity to present our views.

MEMORANDUM

State of Alaska
DEPARTMENT OF FISH AND GAME

TO: Craig Lindh
ANILCA Coordinator
Division of Governmental Coordination
Office of Management and Budget

DATE: January 31, 1990

FILE NO.:

TELEPHONE NO.: 465-4290

BUDGET

SUBJECT: Revised Southeast Conference's Tongass Reform Act Proposal

FROM: Richard Reed
Regional Supervisor
Habitat Division
Department of Fish and Game

In response to your request of January 29, I am providing you with a technical analysis of the recently proposed changes to the special management areas identified by the Southeast Conference (SEC) last year for consideration by Congress as part of the Tongass Timber Reform Act. A SEC Board member recently proposed changes to the March 1989 SEC policy statement. The Board intends to vote on the proposal after approximately one week of community review.

HISTORY

The department provided the SEC with summaries of the fish and wildlife resource values of the twelve areas identified by communities as important fish and wildlife use areas (Shea to Ayers, February 16, 1989). These summaries were included in the SEC's 1989 policy statement as the "Descriptions of Special Areas" (SEC, March 10, 1989) and are not repeated in this analysis.

The SEC recommended to Congress that twelve areas be protected from timber harvesting and roading by establishing them as permanent LUD II areas, as defined in the Tongass Land Management Plan (amended 1985-86). A LUD II designation would allow most other multiple uses of national forest land other than logging and roading.

ASSUMPTIONS

In order to evaluate the effects on fish and wildlife of the changes to the original twelve areas, it is necessary to further define the most likely management of the areas that would occur if the revised SEC policy, as proposed, is adopted by Congress. For this analysis, we made the following assumptions:

1) "Multiple-use" areas will be clear cut under guidelines of the National Forest Management Act, given that primarily high-volume, old-growth forest was deleted from the no-harvest areas, and that most uses other than logging would be allowed within LUD II areas.

2) In recent dealings with the Forest Service, we have found that they are employing no-cut buffers, ranging from 25 ft to greater than 100 ft, along anadromous fish streams. Given the importance of these areas for fishery production, for purposes of this evaluation we are assuming a 100 ft no-cut buffer along anadromous and high quality resident fish streams.

3) In the proposed areas in which over 50% of a watershed would be classified for multiple use/timber harvest, the assumption is that the Forest Service will disperse clear cuts in time and location to preserve the biological productivity of every fish stream as required under existing laws, regulations, plans and the Aquatic Habitat Management Handbook. Watersheds in which dispersal of clearcuts is a concern include Karta, Chuck, Kadashan, Patterson, Nutkwa, and several smaller systems in upper Hoonah Sound.

4) Road construction and stream crossings will be designed and constructed so as to not adversely effect fish habitat.

5) The Forest Service will not allow roading or timber harvesting on overly-steepened slopes or soils with high erosion potential to prevent sedimentation of fish habitat.

Given the above assumptions about the protection of fish habitat, and the problem of predicting the impacts to fish from the final on-the-ground roading and logging practices, this analysis assumes there will be no significant adverse effects on fish habitat in these special management areas.

METHODOLOGY

The evaluation of wildlife habitat was based on the draft habitat capability models for Sitka black-tailed deer, brown bear, black bear, marten, bald eagle, river otter, and cavity nesting forest birds that are under development by the department, in conjunction with the Forest Service and the U. S. Fish and Wildlife Service. The Forest Service's timber type maps and topographic maps were used, along with these draft models, to assess the value of the wildlife habitats within the areas proposed for no timber harvest and for multiple use.

The importance of the areas to hunters from Juneau and Ketchikan was based on the department's harvest records for the year 1987. The analysis of the susbsistence use of each of the areas was based on draft maps of subsistence use patterns for each rural community in Southeast Alaska (Tongass Resource Use Cooperative Study, draft maps, June 1989).

FISH AND WILDLIFE VALUES OF NEW OR REVISED SPECIAL MANAGEMENT AREAS

Kadashan:

The Kadashan drainage has long been recognized by the department as an extremely rich and diverse wildlife area. It supports one of the highest-density brown bear populations in Southeast, along with high-density deer populations, and abundant marten, river otters, bald eagles, and waterfowl. The proposed multiple use/timber harvest zone includes some of the best deer winter range and riparian brown bear habitat in the drainage. The extensive roading required for timber harvest would have a serious adverse impact on brown bears and marten by increasing human access and fragmenting habitat. Although some important riparian habitat along the upper Kadashan River would be protected, the proposed no harvest zone would not adequately protect brown bear habitat values or high-value deer winter range.

Residents of Tenakee and Haines consider the area to be one of their most reliable areas for their subsistence harvest of deer. Hoonah residents also hunt deer here. Tenakee residents harvest salmon along the river, and fish and invertebrates in the estuary. Juneau hunters spend around 150 hunter-days hunting deer in this easily accessible drainage.

Chuck River:

The Chuck River watershed supports high populations of black bear because of the very large salmon runs and productive riparian habitat. The riparian and upland old-growth forests provide excellent habitat for marten, river otters, and cavity-nesting birds. The proposed multiple use/timber harvest zone includes all of the riparian habitats along the Chuck River. In contrast, the proposed no harvest zone contains little important wildlife habitat.

The department is not aware of any significant subsistence uses in the Chuck River area. Juneau residents, however, do frequently hunt mountain goats and black bear in the area. Black bear hunters from Haines, Hobart Bay, Wrangell, and other states also use the area.

Goose Flats:

This area includes some of the more important fish and wildlife habitat on Chichagof Island, including Goose Flats, Lisianski River and upper Hoonah Sound. Some of the highest deer densities in southeast Alaska are found along the lower slopes of upper Hoonah Sound and Finger River. The proposed multiple use/timber harvest zone would include almost all habitats below 500'elevation. Higher volume old-growth forests below 500' elevation are the most valuable deer winter range; old-growth forests above 500' elevation are mostly scrub forest and muskeg with little wildlife value during the winter. Excellent brown bear habitat occurs throughout the proposed area, especially the riparian old-growth forests along the Lisianski River, Goose Flats, and Patterson Creek. Under the SEC proposal crucial bear habitat will be eliminated by the roading and logging of Patterson Creek and Goose Flats. The protection of this area from logging and associated roading may be critical to the long-term maintenance of a healthy brown bear population on Chichagof Island. The proposed multiple use/timber harvest zone also includes all of the forest in the beach fringe zone, which is the most important habitat for bald eagles, river otters, and several forest birds. The proposed no-harvest zone would protect little important wildlife habitat.

Residents of Tenakee, Haines and Hoonah consider this area to be one of the most reliable for the subsistence harvest of deer. Hoonah residents harvest salmon along the rivers and fish and invertebrates in the estuaries for subsistence. Juneau deer hunters spend around 200 days in the upper Tenakee Inlet area, including the Goose Flats country. Brown bears are also hunted in this area.

Nutkwa:

This proposed area includes a portion of southwestern Prince of Wales Island south of the community of Hydaburg. The area provides excellent habitat for black bears, marten, and river otters. It also supports moderate numbers of deer, wolves, and bald eagles. The proposed multiple use/timber harvest zone would remove the most important riparian and upland wildlife habitats from protected status. The proposed no harvest zone would protect important beach fringe habitats along the Nutkwa Lagoon, but little other important wildlife habitat.

Residents of Hydaburg consider the entire area to be one of the most reliable for their subsistence harvest of deer. They also subsistence fish for salmon and other finfish in the area. Edna Bay residents use the estuarine waters for their subsistence harvest of invertebrates. Ketchikan residents spend around 50 hunter-days harvesting deer in Nutkwa. Black bears are harvested by residents of Prince of Wales Island, Ketchikan, other regions of Alaska and non residents.

Karta:

The Karta River drainage is excellent black bear and marten area, and also supports moderate numbers of deer, wolves, river otters, bald eagles, and wintering trumpeter swans. The proposed multiple use/timber harvest zone would allow a substantial portion of the important riparian old-growth forests in the Anderson and McGilvery drainages to be harvested, as well as the adjacent uplands which contain important habitat for deer, marten, and cavity-nesting birds. The proposed no harvest zone would protect important lakeside habitats for river otters, black bears, and bald eagles, and valuable riparian and low-elevation forests along the Karta River.

For residents of Hydaburg, the Karta drainage is one of the most reliable sources of subsistence deer. Residents of Thorne Bay and Kasaan also hunt deer within the area. Ketchikan residents spend around 100 days hunting deer in the drainage. Many communities depend on the highly productive Karta River fisheries for subsistence fish, including: Hydaburg, Kasaan, Hollis, Coffman Cove, Saxman, and Thorne Bay.

Calder/Holbrook:

This area includes portions of northwest Prince of Wales Island and north Kosciusko Island. The proposed multiple use/timber harvest zone includes some of the best deer winter range in southern Southeast Alaska, especially the southwest slopes of Mt. Calder and the area around Holbrook Mountain. The potential timber harvest under this proposal would substantially reduce the capability of the area to produce deer. Both of these areas provide excellent habitat for black bear, marten, river otters, and cavity-nesting birds. The proposed no harvest zone contains mostly fair-to-moderate value deer winter range, along with important beach fringe habitats.

Residents of many communities consider all, or part, of the proposed area to be one of the most reliable areas for their susbsistence harvest of deer, including: Craig, Edna Bay, Hydaburg, Klawock, Point Baker, and Port Protection. Ketchikan deer hunters spend around 1000 hunter-days in the area.

Trap Bay:

This proposed area is a small watershed on the south side of Tenakee Inlet. The area provides excellent habitat for deer, marten, river, otters, and brown bears. Hydrologic and fisheries research has been conducted in the area over the last decade. The proposed multiple use/timber harvest zone would potentially harvest the best deer winter range, along with a significant portion of the important riparian habitats in the drainage. The configuration of the logging zone would greatly fragment the remaining habitat in the drainage, further reducing the habitat value for brown bears, marten, and deer.

Residents of Tenakee, Skagway and Haines consider the area to be one of the most reliable areas for their subsistence harvests of deer. Hoonah residents also harvest deer in this drainage. Juneau deer hunters spend at least 100 hunter-days in the area. The area also provides for the subsistence harvest of salmon.

Naha River:

This proposed area, north of Ketchikan on the northwest side of Revillagigedo Island, includes many small lakes, connected streams, and an estuarine lagoon. The area supports high numbers of black bears, marten, and river otters, along with moderate numbers of deer, wintering trumpeter swans, and wolves.

Hydaburg residents use the area as one of their most reliable subsistence deer harvest areas. Ketchikan deer hunters spend around 150 hunter-days in this drainage. Black bear hunters from Ketchikan, Petersburg, Anchorage and other states hunt this area quite heavily, with 22 bears harvested in 1987.

Pleasant/Lemesurier/Inian Islands:

These islands are located in the middle of Icy Strait south of Gustavus. These islands support significant populations of bald eagle, deer, and Vancouver Canada geese. Pleasant island has been recommended as a research natural area because of its unique plant communities and value as a comparison to the recently deglaciated areas in Glacier Bay National Park.

Residents of Haines, Gustavus, Elfin Cove, and Hoonah consider all, or a portion, of this area to be one of the most reliable areas for their subsistenece harvest of deer. Tenakee deer hunters also hunt the area. Juneau deer hunters spend around 70 hunter-days on these islands. Residents of Haines, Elfin Cove, Hoonah, and Pelican subsistence fish along the coastline of all the islands.

Point Adolphus/Mud Bay:

This proposed area includes a portion of northern Chichagof Island from Pt. Adolphus to Port Althorp. Because of the large intertidal mud flats, riparian old-growth forests, and estuarine habitats, the area supports high numbers of brown bears, bald eagles, marten, river otters, and waterfowl. The lower-elevation old-growth forests provide important deer winter range. The proposed multiple use/timber harvest zone would potentially harvest the critical beach fringe and riparian wildlife habitats in Idaho Inlet, including a large portion of the best deer winter range. The proposal would not maintain wildlife values.

Residents of Haines, Elfin Cove, Gustavus, Hoonah, Pelican, and Sitka consider various portions of the area to be one of the most reliable areas for their subsistence harvest of deer, including the area available to timber harvesting. Hoonah residents also subsistence fish for salmon along the rivers at the heads of Idaho Inlet and Port Althorp. Juneau deer hunters spend over 800 hunter-days in the area each year, with 59 percent of the deer harvested from the area to be made available for timber harvesting.

Mansfield Peninsula:

The proposed area is a small portion of northern Admiralty Island. The Mansfield Peninsula is an important wildlife use area, especially for Juneau residents. Unfortunately, however, the proposed no harvest zone includes only a small portion of the important wildlife habitats. The best deer winter range, along the western slopes of Robert Baron Peak and the drainages into Hawk Inlet, would not be protected. Likewise, important brown bear, marten, river otter, bald eagle, and cavity-nesting bird habitats have not been included in the proposed area.

Residents of Angoon and Point Baker consider the area to be one of the most reliable for their subsistence harvest of deer. Skagway residents also hunt deer in the area. Juneau deer hunters spend around 2500 hunter-days harvesting over 600 deer from the entire Mansfield Peninsula; however, the exact level of hunting pressure within this small area is not known.

SUMMARY

The proposed modifications to the Tongass position of the Southeast Conference would remove permanent protection for a substantial amount of valuable fish and wildlife habitat in the areas recommended for protection under the original position. For the most part, the timber harvest proposal targets high volume, old-growth forest at lower elevations and within beach and riparian zones. These areas are also the most important wildlife habitats. The loss of wildlife populations in these areas would greatly exceed that suggested by the percentage reduction in area. In some cases (i.e. Chichagof Island), the proposal illustrates very poor habitat management for wildlife. Under this revised proposal, the areas would not provide abundant, stable wildlife populations for the subsistence and recreational users of the areas.

If you have any questions, please contact me or Lana Shea.

cc: Frank Rue
Lana Shea
Dave Anderson
Rob Bosworth
Scott Marshall
Fred Gaffney

The **Chairman**. Well, why do you not, before you finish your statement why the State is not supporting the new Southeast Conference proposal?

Mr. **Lindh**. Well, as I said, we have done an analysis of the resource values that were identified last March, and we have looked at the kind of input that we have received, that has come in from the communities, both at that time and what has come in more recently.

Based on that, our judgment is that the compromise advanced last spring is probably as good a compromise as we will ever see in southeast Alaska. A lot of people do not support it, but I just do not think we will get any closer than that one.

The **Chairman**. Why is this one bad?

Mr. **Lindh**. Well, I did not say it was bad, but what I would say is that it is probably less responsive to the diverse community interests that we are aware of.

The **Chairman**. You say "diverse community interests." You mean it is closer to a consensus of what Alaskans want?

Mr. **Lindh**. I would say that. There are very diverse communities, some that are almost wholly dependent on timber for their economy, others that are entirely fishing or partly subsistence.

Any time you get that kind of spread of interests across the landscape, it is very difficult to get them to agree on something. We think that as close as you can get to that is what we saw last spring.

The **Chairman**. Thank you very much, Mr. Lindh.

Next, Richard M. Griffin with the Southeast Conference.

STATEMENT OF RICHARD M. GRIFFIN, ON BEHALF OF THE SOUTHEAST CONFERENCE

Mr. **Griffin**. Thank you very much, Chairman Johnston and Senator Murkowski.

What I would like to do, sir, if I could, is read into the record a letter from Mayor Ted Ferry of Ketchikan, who is the President of Southeast Conference. This was sent to you on February 12th and I believe you have it before you:

> Dear Senator Johnston:
>
> We thank you and other members of the Senate Energy and Natural Resources Committee for the hard work you have done on Tongass National Forest management issues. We also appreciate the consideration and interest you have shown for the original Southeast Conference proposal.
>
> As your deliberations on the Tongass near an end, we would like to make several points regarding the Conference proposal:
>
> First, it continues to be the preference of the Conference that disputes over the Tongass land use be resolved through the Tongass land management plan and its revision process. We believe that the TLMP revision process is fair and allows the public to participate. The process assures careful consideration of both local and national interests and leads to the best use and-or preservation of the resources.
>
> To date, the U.S. Forest Service has spent millions of dollars on the TLMP process and has held meetings regarding the issue all throughout southeast Alaska.
>
> We acknowledge, however, Congress will probably pass legislation affecting the Tongass before the U.S. Forest Service completes their revision process. If it does, the question is what should it use in place of the Forest Service land proposal, the Southeast Conference proposal or H.R. 987's land proposal?
>
> We believe that if Congress must act, they should do so with appropriate recognition of existing legislative acts and in ways which will allow the TLMP revision

process to proceed and which would facilitate, rather than block, that planning process.

Second, while we have identified a number of areas that should be protected from commercial harvest, we have always specified that these areas should not be classified as, in quotes, capital W, Wilderness. We previously have proposed a legislative LUD-2 classification. However, this classification will no longer be used by the Forest Service in the TLMP revision.

We thus support instead a legislative land use classification for the protected areas that will protect certain land areas from commercial timber harvest, while not stopping mining, lodges, roads, or other needed uses which fit within the TLMP.

Third, as you and others, including the Southeast Conference, have heard through a continuous flow of communications, the twelve areas and their boundaries as originally proposed did not reflect some concerns very dear to many communities in southeast Alaska. As a result, a proposal was submitted to the Southeast Conference board on January 23rd, 1990, which proposed a modification of some of those original boundaries and added several areas to be included in the no-timber harvest designation.

This proposal is being forwarded to you, as it was approved at a subsequent meeting on February 2nd, 1990. Pertinent comments from the public received during the comment period will follow shortly under separate cover.

This proposal adds areas important to five southeast communities to the original list. Six of the original twelve areas have not been changed and six have been changed to allow resource development not considered in the original proposal.

You will be acting on a matter that deeply affects the lives of those who live here in the Tongass National Forest. We urge you to keep that fact before you as you deal with this difficult matter.

Sincerely, Mayor Ted Ferry, Ketchikan, President, Southeast Conference.

The CHAIRMAN. Mr. Griffin, by the way, we do not have a copy of your formal proposal.

Mr. GRIFFIN. I apologize. I was told that you had, sir.

The CHAIRMAN. Thank you very much, Mr. Griffin.

Next we will hear from Mr. K.J. Metcalf, Vice President of the Southeast Alaska Conservation Council.

STATEMENT OF K.J. METCALF, VICE PRESIDENT, SOUTHEAST ALASKA CONSERVATION COUNCIL

Mr. METCALF. Thank you. I appreciate being here today.

For the record, my name is K.J. Metcalf. I live in Angoon, Alaska. I worked 20 years for the Forest Service on the Tongass, was involved in planning, public involvement, and as manager of Admiralty Island National Monument.

In 1982 I resigned my position because I totally disagreed with the timber at any cost approach to managing the Tongass, and I realized that reform of the Tongass would only result from pressures outside of the agency, rather than within the agency.

I am here to state that SEACC strongly supports permanent protection for the key fish and wildlife areas and the mandatory buffer strips in H.R. 987.

Also, since 1986 the Forest Service has said to wait until the Tongass revision is completed before passing legislation. The promised revision is currently two years behind scheduling, totally inadequate, and it is likely that it will not meet the legal requirements.

The only solution is for Congress to enact reform legislation that will help solve the enormous problems of the Tongass and will allow the Forest Service to develop a workable plan.

In the past SEACC has testified before this committee in support of the wilderness protection for 22 key fish and wildlife areas and special management protection for a twenty-third area. We have already submitted full descriptions of these areas for the record. Today we also support the addition of a twenty-fourth area, the Salmon Bay Lake Watershed.

I can assure you there is strong support for these areas from those of us who live in southeast Alaska, and we can see firsthand what is happening to our land. Alaskans have established a clear record supporting lands protection by law.

They no longer have faith in the Forest Service policies. Currently 15 communities, comprising the majority of communities and the majority of population in southeast Alaska, the State of Alaska, all of our regional commercial fishing groups, Sea Alaska Corporation and other Native groups, over 100 tourism-related businesses, and many others supportive legislative protection of key fish and wildlife areas.

SEACC supports H.R. 987's buffer strip language as the minimum standard for areas to be logged. Even the Forest Service states in its most recent planning document that the highest and best use of the timber in the riparian zone is to leave the trees standing for fish protection.

While buffers are critical, they alone do not provide adequate fish and wildlife protection. Buffers must be established in concert with protection of entire watersheds.

I ask the Senators to recognize that over half of the highest volume timber, which is also the best fish and wildlife habitat, has already been logged, most of it logged with only minimal consideration for fish and wildlife, and only 30 percent of high value fish and wildlife watersheds on the Tongass are permanently protected.

So many million dollar salmon watersheds are still scheduled for logging. What we are talking about here is saving what is left.

In 1990 I think it is truly the last stand for many of the key old growth Tongass watersheds. If these areas are not protected by law, the most critical and most fought-over areas will be logged within the next five years.

I think it is important to state that H.R. 987 does not mean loss of Tongass timber jobs. If H.R. 987 were enacted, the Forest Service timber figures—and they were validated today—show a yearly scheduled timber supply of some 390 million board-feet per year, and that is roughly 100 million board-feet above the average Tongass harvest of 295 million board-feet since 1980.

The revised Tongass plan that we have heard so much about, I am here to tell you that it is in serious trouble. To understand the flaws it is important to examine the basic Forest Service assertions.

The Forest Service asserts that no matter how much timber is cut, there will be no serious impacts to fish and wildlife population, subsistence, or recreation activities, and no reduction in employment dependent on these resources, and that is clearly stated in this document here.

I think it is more important to look at the backup data that the Forest Service has provided. We have four of these books that we have analyzed carefully, and I would direct you, as we were earlier directed, to page 5 of my testimony, where it shows the reductions in wildlife.

I think the regional forester was in error, that this was the wildlife at least for KPC. This was the alternative display that was best for wildlife. This was not the worst case scenario, as was stated.

I further refer you to page 15 and 18 in my testimony, which shows the charts of the decline of wildlife. Those figures came directly out of the Forest Service computer runs and their backup programs. So that is one of the serious problems that we are facing.

But perhaps even more serious is the fact that the timber data base is so inaccurate that it cannot be applied to any land unit smaller than what the Forest Service calls geozones. These geozones average about 375,000 acres, and the Forest Service will be unable to assess on-site impacts in sufficient detail to resolve specific issues.

These major problems with the timber type data base force the Forest Service into abandoning most of its promises as to what the revised plan will be able to do. After all of these years of telling the public to wait for the Tongass revision, the Forest Service is now saying, wait until later because the revision will not be specific enough.

I would like to enter into the record a list of the promises that the Forest Service made in their study plan and, according to our discussions with them, what they will now be able to provide.

We met several weeks ago with the Tongass study planning team and we reviewed with them the alternative inputs that they are going to provide in this draft. They had one that incorporates H.R. 987.

In the alternative that they showed us, the Forest Service had removed hundreds of thousands of acres of commercial timber land, some of it that had already been cut, and this was far beyond what was proposed in H.R. 987. As a result, this alternative implies a very large reduction in timber supply, perhaps three times what is really in H.R. 987, and I think this is an obvious attempt by the Forest Service to deceive the Congress and the public and to falsify or discredit H.R. 987.

I'm just simply saying that the draft that the Forest Service is going to bring out in June or July, whenever it comes out, will not lessen the level of controversy. In fact, I can guarantee it will increase it.

The only solution is for Congress to enact comprehensive Tongass reform, and I urge you to do that. Thank you.

[The prepared statement of Mr. Metcalf follows:]

STATEMENT OF
K.J. METCALF, VICE-PRESIDENT
SOUTHEAST ALASKA CONSERVATION COUNCIL

REGARDING WILDERNESS and BUFFER ZONE PROVISIONS OF H.R. 987

BEFORE THE
U.S. SENATE ENERGY AND NATURAL RESOURCES COMMITTEE
FEBRUARY 26, 1990

Mr. Chairman, members of the Committee, thank you for the opportunity to testify today. My name is KJ Metcalf. I live in Angoon, Alaska. I am speaking for the Southeast Alaska Conservation Council (SEACC), a grassroots coalition of 13 organizations in 11 Southeast Alaska communities. SEACC is made up of people who live and work in the Tongass National Forest.

I want to emphasize my background of more than 20 years in planning and public information with the Forest Service on the Tongass. I was the planning team leader for the first phase of the original Tongass Land Management Plan and remained on the planning team through completion of the plan. From 1978 to 1982, I was manager of Admiralty Island National Monument. During my Forest Service career I received a number of awards for my work, and I feel I was a valued employee.

In 1982 I opted for an early retirement from the Service because of my growing alarm at the "timber at any cost" approach of managing the Tongass. I was convinced that reform was essential if the Forest Service was ever to become a multiple-use agency --and I knew that reform would be the result of external forces, it would never come from within the agency.

SUMMARY OF SEACC POSITION:

Since we have testified before this Committee in February and April of 1989, our previous hearing statements still hold. Additionally, we have submitted numerous items for the hearing record over the past year.

SEACC firmly believes that comprehensive reform legislation MUST include legislated permanent lands protection as Wilderness or some other type of special designation. Such legislation must also include a strong buffer strip standard. Therefore, SEACC strongly supports the lands and buffer zone protections embodied in H.R. 987. We believe that lands and buffers need Congressional protection now, and that the Tongass Land Management Plan (TLMP) Revision will not solve the major problems on the Tongass.

I. LANDS PROTECTION

More specifically, in 1989 SEACC strongly supported 22 areas for Wilderness and one area, the Yakutat Forelands, for special management as a critical fish and wildlife habitat area.

In 1990 we now support 23 areas for Wilderness plus the special management designation for the Yakutat Forelands. The new area on the list is the Salmon Bay Lake watershed. Since hearings last year, Salmon Bay Lake, a premier sockeye and coho salmon producing area, was selected for logging and roads. Commercial fishing groups are now embroiled in defending this area. Also important waterfowl, deer, and black bear habitat, the watershed is described by Alaska Department of Fish and Game as "one of the highest value wildlife areas on Prince of Wales Island." This valued fishery, recreation, and subsistence use area definitely deserves permanent protection. Please remember that Prince of Wales Island has been heavily logged with little consideration for fish and wildlife values, making this area that much more valuable.

We submitted full descriptions of all these areas for the record last year. We have also provided information on Salmon Bay Lake to Committee staff. For the record we are submitting descriptions of the areas prepared by Alaska Department of Fish and Game that were given to the House Interior Committee in March 1989. (Attachment A)

Overall, the total impact of setting aside these 24 areas by law on the annual scheduled timber supply would be 50 million board feet per year. (Attachments B and C) These are the most valid numbers and are based on Forest Service VCU printouts. These numbers are solid until the Tongass Plan Revision is completed, and may very well prove more reliable than the new timber data being used in the Revision. (Attachment D) Forest Service testimony before the House Interior Committee in 1989 was in the same ball park at 53 million board feet per year, the major difference being how Yakutat Forelands was calculated. (Attachment E) SEACC used a 1986 timber base inventory from a Management Area Analysis -- the Forest Service used their 1979 data base. (Early estimates from Forest Service officials presented at Analysis of the Management Situation (AMS) briefings regarding H.R. 987's impact on tentatively suitable timber lands, which includes all LUD I Releases and LUD IIs, is 20% of a total potential supply of 580 million board feet per year. This would leave 464 million board feet per year potentially available for timber harvest -- actually larger than the current 450. Also under the AMS Maximum Timber Harvest Alternative, the Wilderness set-asides (including LUD Is and IIs) would amount to 77 million board feet/year -- leaving over 700 million board feet/year available for harvest.)

II. BUFFER ZONES

SEACC supports H.R. 987's buffer zone language as the MINIMUM management standard for areas that are allocated to logging and road building.

Buffer zones do not provide enough protection to guarantee the integrity of critical fish and wildlife watersheds. Buffer zones cannot and should not be used as a substitute for protection of entire watersheds. If only buffer zones were protected, the Forest Service would be able to continue targeting the high volume old-growth forests at low elevations (below 500 feet) and within riparian and beach fringe zones. These are the most important wildlife habitats. Buffers simply do not go far enough to protect critical wildlife habitat such as old growth for bald eagles, critical old-growth winter range for deer, and important old-growth riparian zones critical for brown bears. They do not provide enough protection for areas of unstable soils and steep slopes. Buffers alone certainly will not protect the scenic, recreation, nor subsistence values of the most important and threatened watersheds in the Tongass.

In short, buffers should be viewed as a complement to the needed additional protection of key fish and wildlife watersheds -- not a substitute. Furthermore, the impact of protecting buffers as in H.R. 987 would only require set-aside of some 4% to 6% above the current Forest Service management practices. This is a small impact on timber with a big benefit to salmon.

We understand that the Forest Service, however, is now claiming a 20% impact on the timber base. This is a deliberate attempt to misconstrue the U.S. House's intentions as they were stated on the House floor. It is interesting to note that the Forest Service's AMS actually makes a strong case for no-cut buffer zones. The document shows, from both an environmental and an economic standpoint, that timber should not be cut within the riparian zone.

TOTAL IMPACTS OF BOTH LANDS PROTECTION AND MANDATORY BUFFERS:

The combined impact on the scheduled timber supply of setting aside the 24 areas and providing minimum buffer zone standards results in a 13-14% reduction of the currently scheduled Tongass timber supply. (Calculation of this estimate provides that buffers and Wilderness are not double-counted because there is considerable overlap.) This leaves 390 million board feet per year available right now (and this number could be higher after the Tongass Revision re-allocates more lands for timber cutting). This is roughly 100 million board feet above the annual average Tongass harvest of 295 million board feet per year (this also includes the "record" year of 1989 with 377 million board feet cut). Therefore no existing Tongass dependent timber jobs would be lost by comprehensive legislation. In fact, this leaves enough timber to allow an increase in the number of Tongass dependent jobs.

Helen Clough, Chatham Area District Ranger, stated in an April 20, 1989 radio interview: "Timber Harvest on the Tongass in 1988, a good year for the mills, was less than 400 million board feet. Even if the most extreme environmentalist bill were to pass, there would, theoretically, still be about 400 million board feet per year in the the Tongass timber base. Perhaps more. ...There are areas where timber harvest is currently administratively prohibited but that we could make available for timber harvest if we so desired."

These are responsible and reasonable protective measures, especially when you consider the strong support from and by Alaskans for legislated protection of key fish and wildlife areas.

ALASKAN SUPPORT FOR CHANGE:

When Senator Wirth introduced S. 346 he stopped short of proposing Wilderness protection, but he did say: "There is a strong case for permanently protecting these areas....I look forward to hearing from Alaskans who know and depend on these areas..."

The response from Alaskans is impressive. A review of the Committee's field hearing record and official resolutions and correspondence reveals that 15 communities (comprising the majority of communities and majority of population in Southeast Alaska), the Governor/State of Alaska, all our region's commercial fishing groups, Sealaska Corporation and other Native groups, tourism organizations, and many others support legislated protection of key fish and wildlife areas. Some supported Wilderness, other supported legislated LUD IIs. But Alaskans wanted protection by law -- they had no faith in Forest Service planning. (Attachment F)

We do appreciate Senator Murkowski publicly voicing his support for setting aside important land areas. Unfortunately in 1989 Senator Murkowski refused to advocate protection of the core areas of several critically important fish and wildlife watersheds. Today we respectfully urge him to reconsider his position and restore these critical areas to at least the boundaries advocated by the State of Alaska. Otherwise, the gutted proposals for Kadashan, Nutkwa, Lisianski River, and Calder-Holbrook will have tragic results for the small communities of Hydaburg, Pelican, Tenakee Springs, and Point Baker which depend on these areas in their natural condition and support their protection. Logging the Chuck River valley will also cause disasterous results and impact the fishing community of Petersburg. Restoring protection for the core of these areas would truly honor the concerns of these Alaskan communities.

There was some concern expressed by Senator Murkowski that set-asides would restrict road access. The facts do not support much concerns. Attachment G addresses this issue in detail.

THE SOUTHEAST CONFERENCE DOES NOT REPRESENT PUBLIC OPINION:

There will be attempts today to tout the "new" Southeast Conference position as a great proposal and a great compromise. It is neither. The switch in position by this regional pro-development group is an underhanded attempt to thwart genuine community support for protecting key watersheds. But Alaskans weren't fooled -- only 2 communities supported the "new" Conference position and 12 opposed it (representing the majority of people in Southeast Alaska) during the one week official written comment period.

As an example of the turmoil this revised position created, consider Sitka, a pulp mill town and a strong supporter of the timber industry. The Sitka City Council, with a number of its members upset by the change, has not, as of this date, supported the new position. Sitka is still on record as supporting the original Southeast Conference compromise.

The Southeast Conference flip-flop merely represents a shift of one special interest group, not a broad shift of public opinion. The strong support from communities for protection of key watersheds still exists despite the Conference's perported new position. (See Attachment H)

WHY LANDS NEED PROTECTION NOW:

1990 is truly the last stand for many key Tongass old-growth watersheds.

The Forest Service just recently stated that "since 1979, only a few small portions of these [23] areas have been modified as a result of implementation of the Forest Plan." This is an incredibly self-serving statement. The agency did not protect these areas out of the kindness of its heart -- the agency was forced to do so by local protests from Southeast Alaska communities.

A few examples include: When the Kadashan road was built, the City of Tenakee Springs went to court to stop logging. When the Forest Service wanted to log the Lisianski River, the City of Pelican and others stopped the plan. When the Chuck River was going to be logged, fishermen in Petersburg and the Governor of Alaska brought the sale to a halt. When roads and logging were planned for the Yakutat Forelands the City of Yakutat said no roads and no logging. The Native village of Hydaburg is now fighting the Forest Service over Nutkwa. Point Baker is fighting the Forest Service over Calder-Holbrook. The list goes on as the fights continue against the agency that believes in logging first, last, and always.

If these key areas are not protected by law, many will be lost within the next few years. The most critical and the most fought-over areas will be logged and roaded as sure as I'm sitting here today. SEACC agrees with the Region 1 Supervisors' statement that the Forest Service has become "an organization out of control." Congressional action is the last line of defense.

Based on the most recent Forest Service planning documents, the following million dollar fishery watersheds and critical wildlife areas are on the chopping block:

Immediately:
Kadashan
Nutkwa
Lisianski River
Upper Hoonah Sound
Chuck River
Trap Bay
Salmon Bay Lake

Next 5 years:
Calder-Holbrook
Karta
South Etolin
Mud Bay/Pt. Adolphus
Kuiu Island/Bay of Pillars
West Duncan
Port Houghton
Rocky Pass
Yakutat Forelands
Rest of Chichagof proposal
Anan
Naha

The end result will be more roads and more logging with less and less fish and wildlife. A great wildland and wildlife heritage will be lost.

A review of 25 years of Congressional records shows that almost every existing wilderness area with big trees was bitterly opposed by the Forest Service. Six years ago, Brock Evans, now of the National Audubon Society surveyed the Forest Service's record on wilderness during the years 1945-1984. He was unable to find a single example of any Congressionally designated wilderness area in the four Northwest states that had been supported by the Forest Service for "preservation" (an epithet to most of the top agency people) if it had stands of big trees in it that could have been logged at the time that it was being set aside.

When you consider the Tongass in 1990 you must not forget that already over half of the finest and best of the biggest trees have been logged. This logging, for the most part, was done with only minimal consideration for fish and wildlife values. A substantial part of the fish and wildlife habitat has been lost or severely degraded. We are, therefore, talking about saving only a portion of what remains. That is not greed, it is good management.

We will continue losing our wildlife resources from logging if key old-growth habitat is not protected for perpetuity by law. For example, between 1954 and 1988, six indicator species have each already declined by at least 20% on the southern half of the Tongass, according to the Forest Service's 1989-94 EIS for the Ketchikan Pulp Company's 50-year contract area. The EIS predicts major losses for all six species by the year 2054, the end of the 100-year cutting cycle:

Bald eagles will decline 56%
Sitka black-tailed deer will decline 58%
Pine martin will decline 59%
Black bear will decline 39%
River otters will decline 45%
Hairy woodpeckers will decline 69%

For north Chichagof Island, a part of Alaska Pulp Corporation's contract area, grizzly bear numbers are predicted to decrease by 64% by the year 2011, the year the 50-year contract expires (logging began in 1961).

Despite these totally unacceptable predictions for wildlife losses, the Forest Service remains staunchly opposed to protecting important habitat. Protecting all 24 areas won't prevent further declines in wildlife populations, but it will at least prevent them from being as severe as the predictions under the current logging scenario.

LEGISLATED LANDS PROTECTION MAKES SENSE:

Preserving key fish and wildlife habitat areas makes the best long-term common and economic sense for a region heavily dependent on nontimber resources. Ninety percent of the salmon harvested in Southeast Alaska are spawned and reared in Tongass watersheds, yet 70% of the key fish and wildlife habitat areas in the forest are not permanently protected -- many million dollar salmon streams are on the chopping block. The vast majority of Wilderness designated in the Tongass by the 1980 Alaska Lands Act was rock, ice, scrub timber, or marginal forest lands, thus leaving many critical habitat areas unprotected. Twelve other national forests have a higher percentage of land in Wilderness than does the Tongass.

Wilderness designations have had no negative effect on the ability of the Forest Service to meet timber demand. In 1985 the Forest Service stated in a letter to Senator Stevens: "The statement that the most productive areas of the Tongass were included in the wilderness designations is unfounded." Seventy-three percent of the 5.376 million acres of designated

Wilderness in the Tongass is rock, ice, tundra, or scrub timber. Ninety-two percent of the Wilderness acreage is not suitable for timber harvest. Less than 1 1/2% (80,000 acres) of designated Tongass Wilderness is considered to be commercialy important harvestable timber (over 30,000 board feet per acre). This hardly excludes logging from much of the best forests.

THE TLMP REVISION WON'T SOLVE FOREST MANAGEMENT PROBLEMS:

Much has been said about the Tongass Land Management Plan Revision. Unfortunately, the Revision is fatally flawed. After spending $5 million dollars the Forest Service is developing a plan that :

1) Will not have adequate or reliable timber information to resolve on-the-ground issues;

2) Will not meet the intent or the letter of the National Environmental Policy Act (NEPA) or the National Forest Management Act (NFMA), or ANILCA Section 810.

If this Revised Plan is allowed to run its present course, the Plan will be entangled in years of court battles because Southeast Alaska residents will be forced to sue the federal government to protect their livelihoods -- and the Tongass issues will still not be resolved.

In its July 1987 Work Plan, signed by all three Supervisors and the Regional Forester, the Forest Service promised to produce a comprehensive land management plan for the Tongass, with site-specific information. That promise has clearly been broken.

I. WITHOUT CONGRESSIONAL REFORM THE TLMP REVISION WILL BE STIFLED BY THE SAME POLICIES THAT CRIPPLE THE CURRENT PLAN.

The 50-year timber contracts held by Ketchikan Pulp Company and Alaska Pulp Company still drive Tongass management.

In the November, 1989 Final Environmental Impact Statement on implementation of the Alaska Pulp Corporation long-term timber contract, the Forest Service asserted the APC contract takes precedence over the 1980 Alaska Lands Act provisions that established subsistence as a priority use of federal lands in Alaska. The Forest Service stated:

> The Forest Service's contractual obligations were established before the enactment of ANILCA. Congress knew of the existence of these contracts when it passed ANILCA, but did not cancel them. . . . Should a conflict arise between the availability of subsistence resources and compliance with contractual obligations such as the APC contracts, these contractual obligations should be considered 'necessary' under ANILCA Section 810(a)(3)(1).

That is, the Forest Service believes the APC contract supercedes the subsistence provisions of ANILCA.

The mandated timber supply offering of 4.5 billion board feet per decade (450 million feet/year) is still in effect.

The automatic appropriation of $40 million+ per annum has not been eliminated.

Many areas that are critical for subsistence, local community uses, commercial salmon production, wildlife habitat, and unique recreation and tourism opportunities are still threatened by the current Tongass timber program. Lisianski, Kadashan, Mud Bay, and Hoonah Sound are all eligible for road construction and clearcutting in the upcoming APC operating period. Private interests are eager to log the Chuck River araea, and KPC is poised to clearcut the Karta River, Nutkwa River, Calder-Holbrook and Salmon Bay Lake watersheds.

II. THE FOREST SERVICE PLANNING ALTERNATIVES FOR THE TLMP REVISION ARE A SHAM.

The Forest Service has prepared only four alternatives, in spite of the commitment in the TLMP Revision Work Plan to analyze a minimum of five alternatives, with other alternatives to be prepared to "be sure that there are no substantial gaps or voids between the upper and lower limits established through the benchmark analysis (page III-63)."

The alternatives currently under consideration are:

1) the existing Tongass Land Management Plan (TLMP 1)
2) the original Southeast Conference proposal endorsed by the Governor of Alaska
3) a "maximum timber" alternative
4) an alternative the planners title: "incorporates H.R. 987."

The alternative entitled "incorporates H.R. 987" is not a representation of H.R. 987. In this alternative the Forest Service has removed hundreds of thousands of acres of commercial forest land from the timber base on top of the withdrawals implied by H.R. 987. As a result, this alternative implies a very large reduction in timber supply -- a reduction that is probably at least three times greater than that implied by H.R. 987. This is a very flagrant attempt by the Forest Service to deceive the Congress and the public and to falsely discredit H.R. 987.

The "incorporates H.R. 987" alternative withdraws the following lands from the TLMP timber base:

1) all areas proposed for wilderness designation in H.R. 987 (the boundary of the Sarkar Lakes area is wrong--it includes three VCU's east of Sarkar Lakes that are already roaded and logged);

2) buffer strips along class 1 and class 2 streams as included in H.R. 987;

3) all lands allocated to Land Use Designation II (LUD II) in TLMP 1;

4) most if not all Alaska Department of Fish and Game "Class 1" watersheds identified in the Forest Habitat Integrity Plan (FHIP class 1 areas);

5) all "recreation places" mapped by Forest Service planners;

6) all Research Natural Areas proposed for classification by the Forest Service; and

7) many places that are already accessed by roads and where substantial logging has already occurred, such as the Neka River and the Game Creek/Seagull Creek areas on north Chichagof Island, and portions of the Rodman Bay watershed (which is almost 100% clearcut!) on Baranof Island.

The current range of alternatives being considered by the TLMP Revision planning team fails to comply with the National Environmental Policy Act or the National Forest Management Act, and fails to convey any useful new information to Congress regarding Tongass policy and management.

III. THE FOREST SERVICE HAS NEVER PREPARED A TRUE NATIONAL FOREST MANAGEMENT ACT FOREST PLAN FOR THE TONGASS, AND THE TLMP REVISION PRESENTLY FAILS TO MEET THE REQUIREMENTS OF LAW.

The first Tongass Land Management Plan of 1979 did not constitute a true NFMA Forest Plan.

TLMP 1 was prepared after NFMA passed, but before any administrative implementation regulations were adopted. As a result TLMP 1 was an ad hoc planning effort and was not consistent with the NFMA Forest Plans that have been prepared for every other National Forest in the United States.

Throughout the debate on Tongass Reform the Forest Service deferred all administrative concern with management reform to the TLMP Revision. Now, the Forest Service has scuttled much of the promised planning, analysis, and consideration of reform. For example,

> Forest wide subsistence studies have been scuttled or foreshortened
>
> Wildlife habitat modeling will not be site specific in nature
>
> The range of alternatives for Tongass management has been cut to only three poorly conceived options all designed by the Forest Service in-house with no formal public involvement at all.

The Washington Office of the Forest Service has directed the TLMP planners to scuttle plans for a comprehensive, meaningful TLMP Revision.

> James Overbay of the Forest Service's Washington Office has directed the Tongass not to perform a comprehensive, "zero-based" plan that looks at a comprehensive range of alternatives. (Attachment I)
>
> Overbay has also directed Tongass planners not to perform site specific environmental assessment of the many logging and road building and other projects that will be authorized in the TLMP Revision. (Attachment J) As a result there will never be a comprehensive assessment of the cumulative effects of the hundreds of interrelated development actions that will be implemented under the banner of the TLMP Revision.

IV. THE ALASKA REGIONAL FORESTER HAS ACCELERATED THE TLMP REVISION SCHEDULE, FORCING UNPRECEDENTED SHORT DEADLINES THAT OBVIATE MEANINGFUL, PROFESSIONAL PLANNING.

The TLMP Revision Work Plan, prepared by the Forest Service to guide the new planning effort, allowed planners sixteen months from completion of the "Analysis of the Management Situation" (AMS) to the publication of a draft Forest Plan. The full AMS was not published until mid-February, 1990. Yet the Regional Forester has asked the planners to put a draft plan on his desk for review by March 23rd, thereby condensing a sixteen month job into less than two months! Regional Forester Barton and the Chief of the Forest Service promise to publish that draft by May 31st.

V. THE TLMP REVISION WILL ACTUALLY BE LESS SITE-SPECIFIC THAN THE FIRST TLMP!

TLMP 1 subdivided the Tongass National Forest into individual watersheds, a logical geographic unit of analysis. Each of the 867 watersheds was called a Value Comparison Unit, or VCU. The resource values, capabilities, and trade-offs were considered on a VCU basis. "Part II" of TLMP 1 contained a comprehensive schedule of all activities -- timber sales, roads, log dumps --that were authorized in each VCU. The public could discern exactly what was planned for each VCU, and when it was scheduled.

The TLMP Revision uses a very much more general geographic unit of analysis. The Forest Service has abandoned the 867 VCUs and replaced them with only 51 "Geozones", each of which includes many VCUs. Geozones are the smallest unit of analysis, yet at an average size of 370,000 acres the geozones are approximately sixteen times larger than the average VCU. That is, the TLMP Revision analyses of environmental impacts will be conducted on a scale at least 16 times less site specific than TLMP 1.

The Forest Service asserts that because they have replaced the four TLMP 1 Land Use Designations (LUDs) with 24 "management prescriptions", and will allocate smaller-than-VCU sized tracts to these prescriptions, they will be more site specific. This is simply not true.

The Forest Service is confusing allocation with evaluation. In spite of the 24 prescriptions, which will result in a more complicated land use allocation map, the Forest Service will not perform any environmental assessment on this level of detail. Evaluation of impacts of the plan on wildlife, fish, timber, and recreation will only be specific to the geozone level. Even worse, the Forest Service's own specialists concluded that the TLMP Revision timber database is so poor that evaluation of the effects of the plan may not be reliable below the level of the three administrative areas on the Tongass (Ketchikan, Stikine, and Chatham -- areas of many millions of acres in size each).

The leader of the TLMP Revision told members of the SEACC staff and board of directors that the TLMP Revision will not contain a schedule of proposed activities by VCU or watershed, as did TLMP 1. Without such a schedule the TLMP Revision will provide much less detailed information about what the agency plans to do on the ground than did TLMP 1.

VI. THE TLMP REVISION TIMBER INVENTORY IS SO INACCURATE THAT IT HAS NO VALIDITY FOR COMMUNITY-BASED OR SITE-SPECIFIC PLANNING.

The Forest Service's new Geographic Information System (GIS) stores, sorts, and maps the TLMP Revision timber database. Although the GIS machinery is complex and produces artful maps, the quality of the timber maps in the GIS is so poor that the GIS maps and analysis are unreliable.

The Alaska Region of the Forest Service was so concerned about the inaccuracy of its TLMP Revision Timber Type Map that it brought in an agency expert in timber inventory to review the data. That specialist concluded that the data fell short of providing the information needed for National Forest planing, saying:

> Particularly lacking is the means of relating timber estimates to specific smaller areas of land with any reasonable precision.

The Forest Service specialist also explained that the current Timber Type Map in the TLMP Revision GIS "will not provide reliable location specific information."

The Forest Service is attempting to improve the reliability of the Timber Type Map by correlating the timber information with other resource data in the GIS. However, that effort can only make slight improvements, at best. With regard to this effort the same Forest Service specialist's report states:

> For the Tongass situation no great expectation of success is justified.[1]

The upshot of the timber database inaccuracies is that:

> The Forest Service cannot locate timber stands of different volume classes on the ground.
>
> The Forest Service cannot distinguish between the three most important timber stand volume classes on the Tongass.

Site specific evaluation, analysis, and planning is impossible given the TLMP Revision's poor timber maps; the GIS machinery will be drawing maps that are long on beauty but devoid of meaning. As an example of how inaccurate the Timber Type Maps are:

> Among the most valuable timber stands for timber and Sitka black-tailed deer are those stands with more than 50 thousand board feet per acre (50+ mbf/a). These stands are classified as Volume Class 7.
>
> When the Forest Service compared their GIS timber maps of volume class 7 stands to their on-the-ground, measured inventory, they found that only 15% of the areas mapped as volume class 7 were measured as volume class 7 in the field. [see graph and explanatory notes on the following two pages] Even worse, there was no statistically valid basis for comparing the two sets of data.

As an example of how inaccurate the field timber inventory for the TLMP Revision is:

> On the Ketchikan administrative area of the Tongass the field inventoried, calculated average stand volume for stands in the three important volume classes were totally inconsistent with the mapped volume classes in the GIS.

Volume Class #	Volume Class Definition	Average Volume
5	20-30 mbf/a	33.6 mbf/a
6	30-50 mbf/a	31.2 mbf/a
7	50+ mbf/a	35.6 mbf/a

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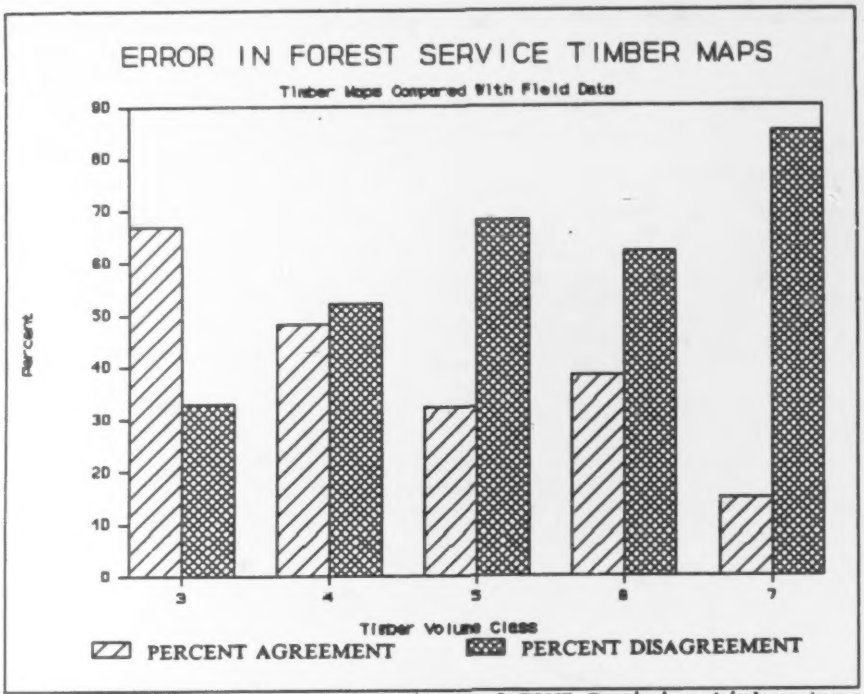
[1] Review of Forest Inventory Methodology and Results, Tongass National Forest, by J.R. Brickell, Forester, TCFPM R-1, 1989.



This figure presents a comparison of TLMP Revision timber type maps with on-the-ground timber inventory data, showing the percentage of mapped stands in each volume class that correspond with field inventory data. Error is 85% for volume class 7.

Source: Forest Service TLMP Revision Benchmark Analysis, Current Management Direction, 2-9-90

TIMBER STAND VOLUME CLASS:
Critical to Understanding Tongass Timber Issues

The Importance of Volume Class

For decades the Forest Service has used the net timber volume per acre of given timber stands as the key characteristic of the Tongass timber inventory.

High volume of timber on an acre of old growth forest on the Tongass is generally an indication that the stand contains the very large, 200-600 year old Sitka spruce and western hemlock that are the most valuable wood products in Alaska. Similarly, high volume old growth stands usually have fewer trees relative to the volume of the stand; this means fewer logs need to handled to recover a given amount of wood.

Research on deer habitat shows that timber stand volume class is the best indicator of deer winter habitat quality. The same big trees that are found in high volume old growth stands create optimal winter habitat for Sitka black-tailed deer. The canopies of the large trees intercept snow, allowing deer more mobility during periods of heavy snowfall. The uneven canopy of the forest still allows enough light penetration for luxuriant deer browse to grow. In contrast, low volume stands intercept less snow and have less browse. Second growth stands grow in dense thickets that have no understory browse.

Classification of Volume Class

The Forest Service classifies timber stand volume class according to the units "thousands of board feet per acre", or mbf/a. The agency also numbers different volume classes. For example, the highest volume class stands are called "Volume Class (VC) 7", and have more than 50 mbf/a. The Forest Service classification scheme is summarized in the table below.

OLD GROWTH TIMBER STAND VOLUME CLASSES
Tongass National Forest

Volume Class	Volume/Acre (mbf/a)
3	0-8
4	8-20
5	20-30
6	30-50
7	50+

VII. INACCURATE GIS TIMBER MAPS RESULT IN INACCURATE ECONOMIC ANALYSIS.

Because the current timber inventory cannot reliably distinguish between the three most important timber volume classes on the Tongass, and because volume class differences determine the net value of timber stands, the validity of FORPLAN analysis in drastically eroded.

VIII. INACCURATE TIMBER MAPS UNDERMINE ANALYSIS OF THE EFFECTS OF TIMBER HARVESTING ON WILDLIFE AND ON LOCAL COMMUNITIES.

Inaccurate timber maps mean the Forest Service cannot locate specific harvest areas or specific wildlife habitat areas on a map or on the ground. Since they do not know exactly where timber will be cut, they do not know exactly where wildlife habitat will continue to exist, and they therefore do not know how timber harvest will effect community use of local wildlife areas.

IX. THE FOREST SERVICE HAS SCUTTLED ITS COMMITMENT TO A COMPREHENSIVE ASSESSMENT OF SUBSISTENCE RESOURCE NEEDS AS PART OF THE TLMP REVISION.

The following quote from the Alaska Department of Fish and Game illustrates the Forest Service's backpedalling on subsistence.

> Subsistence policy decisions now being made in the course of the TLMP revision contradict many of the agreements that we had taken as signs of progress. We have been informed [by the Forest Service] that the TLMP revision is now described as "programmatic" and therefore not subject to the requirements of Sec. 810 of ANILCA. . . . future subsistence evaluations will apparently be conducted at the project [EG: individual timber sale] planning level only, at which point the cumulative effect of land management activities throughout a rural community's subsistence harvest area will not be considered. The TLMP revision, therefore, offers the only opportunity to meaningfully assess long range and cumulative forest management impacts. . . . These recently revised approaches to National Forest planning and management appear to conflict with the USFS subsistence handbook, which calls for Sec. 810 evaluations and "significant impact" findings as part of draft forest plan development. (Attachment K)

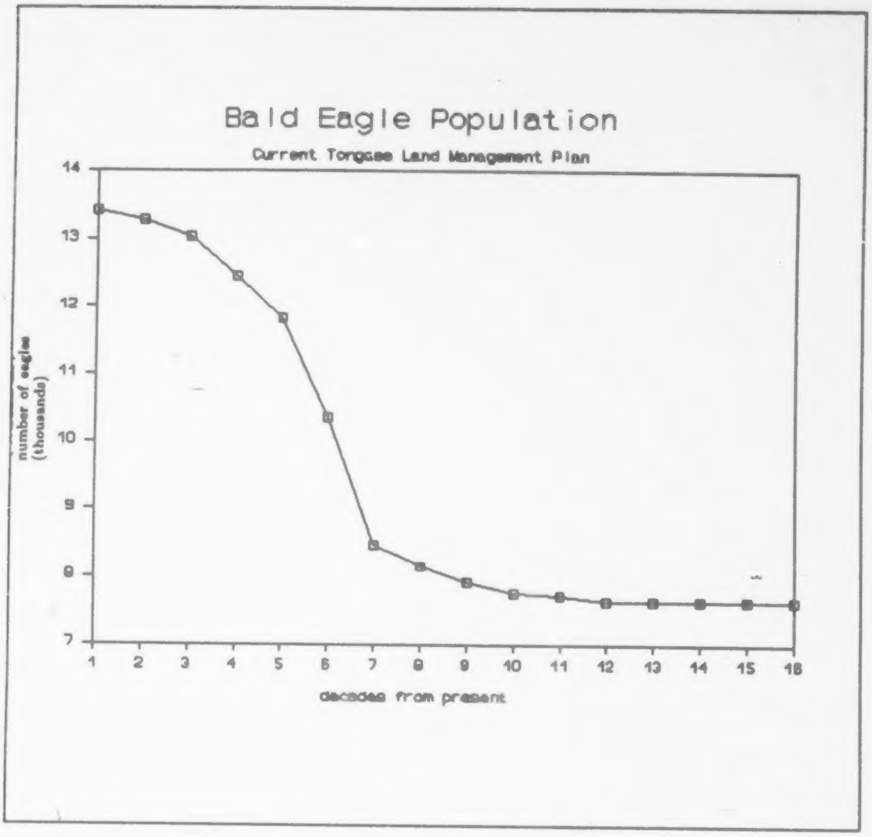
The Sealaska Corporation "Position Paper on the TLMP Revisions" states:

> Subsistence is not an active consideration in the USFS forest planning process until after forest management alternatives are developed or after a project is proposed. This places subsistence in a secondary role to all other uses proposed in the alternatives and projects. Sealaska believes that this is inconsistent with the intent of ANILCA and opens the Forest Service to challenge unless corrected.
>
> Unless agreement can be reached between the Forest Service and Sealaska Corporation on the point that subsistence must be given the priority it deserves in the USFS land use and management decisions for the Tongass, the

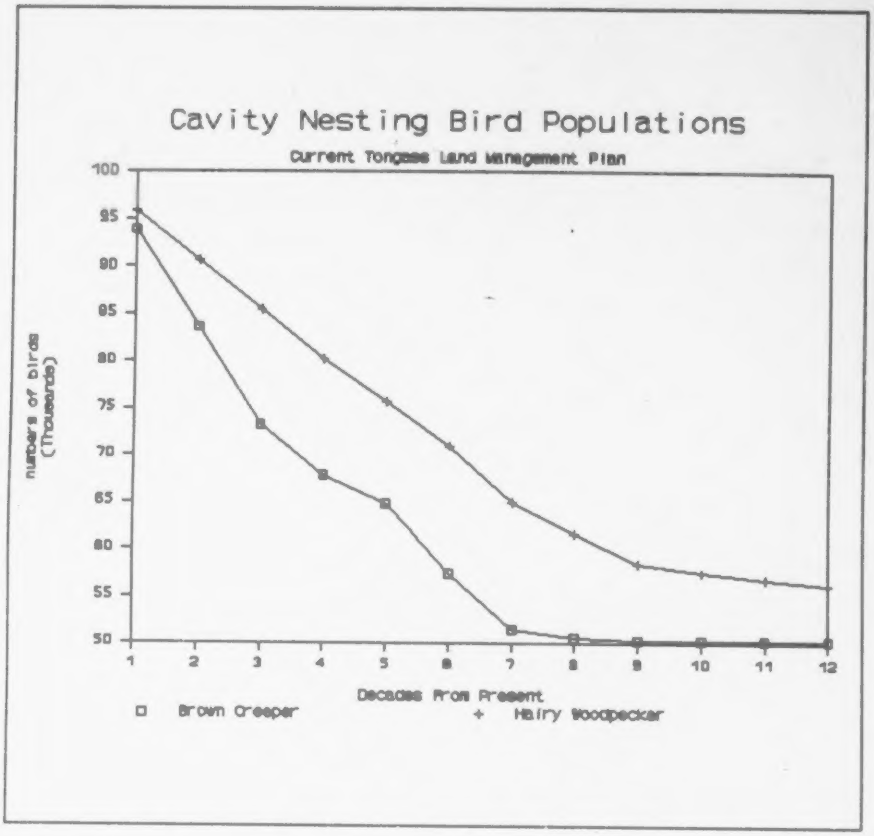
fundamental differences in approach will be irreconcilable in the administrative forum.

X. THE FOREST SERVICE IS COVERING UP THE IMPACTS OF LOGGING ON WILDLIFE.

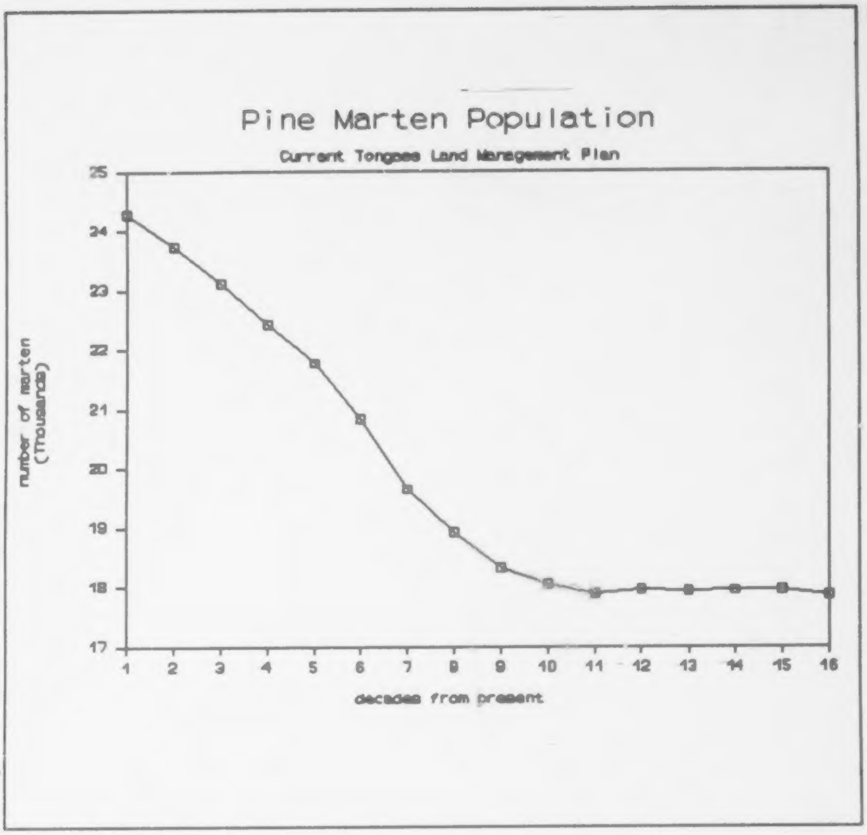
In a recent publication entitled "Understanding the Past . . . Designing the Future", the Forest Service asserted that the effects of clearcutting on wildlife would be modest. However, the agency did not report on its own wildlife population projections, included in the FORPLAN computer "benchmarks". The Forest Service wildlife models predict dramatic declines in populations of important "management indicator species." [Please reference enclosed graphs]



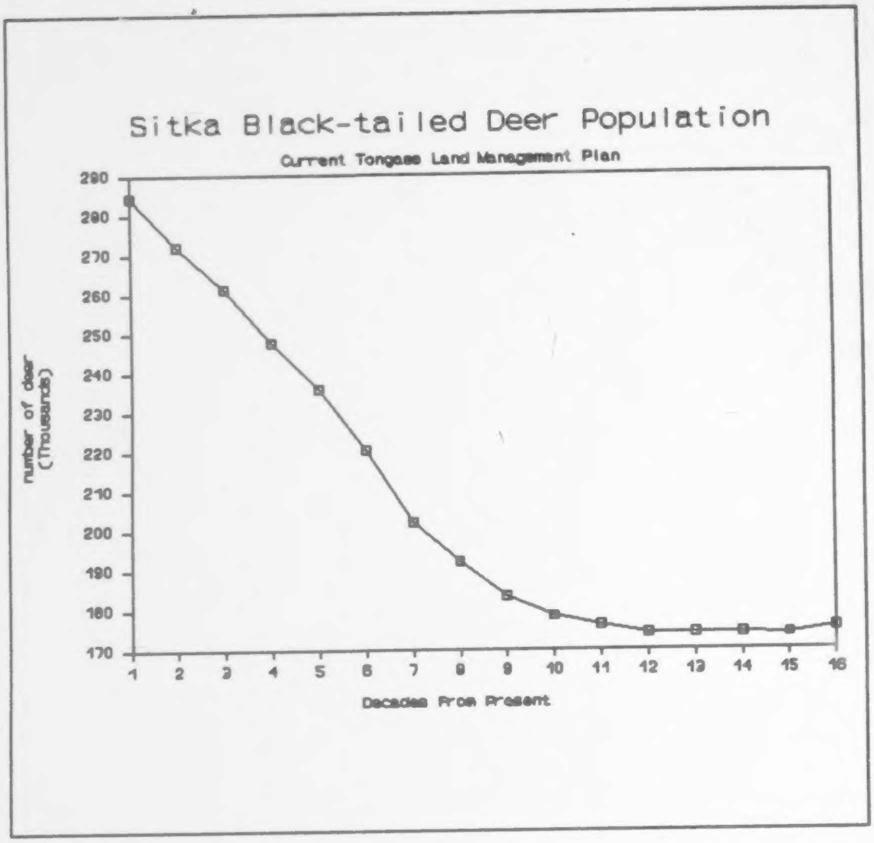
Source: Forest Service TLMP Revision Benchmark Analysis, Current Management Direction, 2-9-90



Source: Forest Service TLMP Revision Benchmark Analysis, Current Management Direction, 2-9-90



Source: Forest Service TLMP Revision Benchmark Analysis, Current Management Direction, 2-9-90



Source: Forest Service TLMP Revision Benchmark Analysis, Current Management Direction, 2-9-90

XI. THE FOREST SERVICE IS MISLEADING THE PUBLIC WITH REGARD TO SALMON PRODUCTION AND LOGGING ON THE TONGASS NATIONAL FOREST.

The same recent Forest Service publication, "Understanding the Past . . . Designing the Future," claims that no matter how much timber is cut on the Tongass, salmon production will increase 10%. This is patently false.

The increase reported is purely hypothetical. Forest Service planners programmed FORPLAN to build salmon enhancement projects and assume increased salmon production, independent of all other resource interactions in the computer model.

The Forest Service assumed that all possible fish enhancement projects would be funded and built in the first decade, to a tune of $33 million. They also assumed all projects would be 100% successful at producing more fish.

However, enhancement projects are often times unsuccessful. In 1979 the Forest Service built a fish ladder on Anan Creek, one of the regions top salmon producers. The average annual escapement since the ladder was built has been less than the 50 year average annual escapement before the ladder was built.[2] Therefore the Forest Service assumption of increased salmon production due to enhancement projects may be very exaggerated.

The attached graph from the Forest Service's analysis of the current Tongass Land Management Plan illustrates the way unwarranted assumptions about salmon enhancement investments distort the effects of logging on coho salmon. Coho salmon production increases in the first few decades, because the Forest Service planners "hard-wired" the computer model to show this. Then, after 2 decades, salmon population is projected to drop.

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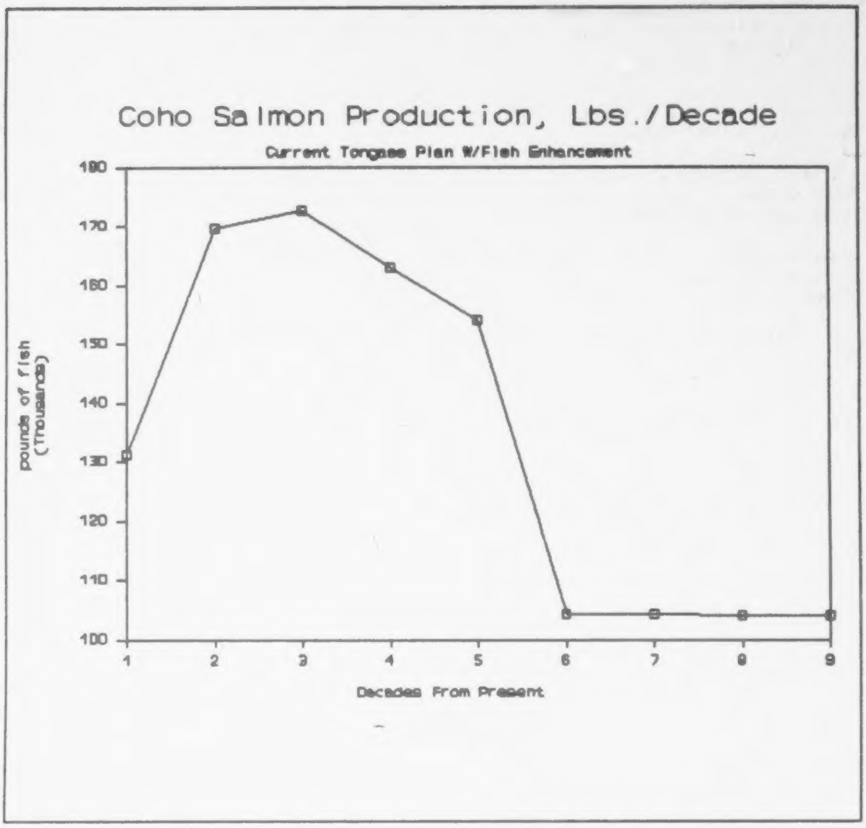
[2] Anan Creek pink salmon escapement data from U.S. Fish & Wildlife Service, Bureau of Fisheries and from Alaska Department of Fish & Game.



Source: Forest Service TLMP Revision Benchmark Analysis, Current Management Direction, 2-9-90

XII. RIPARIAN PRESCRIPTIONS IN TLMP REVISION ARE NOT A SUBSTITUTE FOR MANDATORY 100' BUFFER STRIPS ON CLASS 1, CLASS 2, AND CERTAIN CLASS 3 STREAMS.

The TLMP Revision Riparian Prescriptions do not provide as much protection for salmon habitat as does the National Marine Fisheries Service (NMFS) buffer strip policy.

The NMFS policy calls for 100 foot buffers on all class 1 and class 2 streams, but only those class 3 streams that directly affect class 1 streams, have gradient less than 8%, and which generally can be identified from aerial photographs.

The Forest Service proposes to use two riparian prescriptions in the TLMP Revision. Prescription 13 is titled "Riparian Management Requirement" and is designed to meet the minimum requirements of the National Forest Management Act (NFMA). Prescription 14 is titled "Stream and Lake Protection" and is intended to provide additional habitat protection not granted by prescription 13.

Each riparian prescription calls for various management practices along specific stream classes and specific stream channel types. Stream classes are the same as those used in the NMFS policy. Channel types are defined by gradient (steepness) and geography.
Both prescriptions 13 and 14 allow clearcutting within 100 feet of class 1 streams. For example:

1) Under prescription 13:

    a) clearcutting can occur as close as 60 feet from class 1 streams of channel types B1 and B8 (low gradient floodplain streams);

    b) clearcutting can occur as close as 25 feet from class 1 streams of channel types C2 and C5 (large low gradient streams);

    3) timber salvage sales are allowed up to the banks of class 1 streams of most channel types.

2) Under prescription 14:

    a) clearcutting can occur as close as 60 feet from class 1 streams of channel types B1 and B8 (low gradient floodplain streams);

    b) timber salvage sales are allowed up to the banks of class 1 streams of most channel types.

The Forest Service riparian prescriptions are complex and will require large numbers of professional staff to implement and monitor in the field.

The TLMP Revision prescriptions have specific road building, logging, and other resource management standards for every combination of three stream classes and over 20 channel types. The problem with this system is that it is too complex to be practical and enforceable on the ground.

The truth is that the Forest Service and the state of Alaska do not have enough biologists to monitor timber sale implementation continuously, and that neither federal or state biologists have the authority to compel compliance with the riparian prescriptions in the field. In contrast, the NMFS buffer strip policy is simple, enforceable, and is based on existing, verifiable maps and information.

Both Forest Service riparian prescriptions grant agency field personnel the discretion to deviate from prescription standards on a site by site basis.

Below every single table specifying allowable activities along Tongass streams is the following disclaimer:

> "Timber harvest guidelines may vary, based on site specific analysis, in order to meet process group objectives."

In many cases, even where class 1 streams are concerned, the Forest Service states:

> "Incidental cutting of trees may be allowed in areas not programmed for harvest on a case-by-case basis."

In other words, Forest Service administrators may depart from the riparian prescriptions at any time whenever they believe it is justified. This is exactly the sort of inconsistent enforcement of salmon habitat protection standards that has eroded the public's faith in case-by-case Forest Service management.

Attachment L is a point by point review of the AMS Summary, "Understanding the Past . . . Designing the Future." As you will note, this "user friendly" document is a blantant attempt to deceive the public and the U.S. Congress.

The problems of the Tongass were created by political decisions and the failure of the Forest Service to honor its commitments. Congress must get management of the Tongass back on track by passing reform legislation. Legislation would solve many of the immediate Tongass issues, stop the elimination of the remaining high volume old-growth forests, and allow the Forest Service the freedom to develop a comprehensive plan within the framework of the reforms.

ATTACHMENTS

A SUMMARY OF FISH AND WILDLIFE VALUES OF THE 23 AREAS RECOMMENDED FOR PROTECTION BY HR 987 (3-89)

Prepared by the Alaska Department of Fish and Game, Division of Wildlife Conservation

Anan Creek

An area of 37,331 acres located on the mainland south of Wrangell that drains into the southwestern end of Bradfield Canal. This area has long been recognized as a high value wildlife area, especially for black and brown bears. It is one of the few places in Southeast where black and brown bears can be observed together. The area was closed to the hunting of black bears before statehood to promote bear viewing opportunities. During the summer and fall months, black bears are numerous along the stream, attracted by the abundant spawning salmon. The Forest Service maintains 2 cabins for recreational use.

Berners Bay

A high value fish and wildlife area of 35,379 acres located north of Juneau on the mainland coast. The area is unique because it is a large mainland river system that does not extend into Canada. Moose were introduced here in 1951; now the area provides a high quality hunting experience for state residents, primarily from nearby Juneau. The area also provides high quality habitat for brown and black bears, marten, river otters, wolves, and beaver. Mountain goats and eagles are moderately abundant; harbor seals, sea lions, and whales are common in the bay. The Berners, Lace, and Antler/Gilkey rivers are major anadromous streams flowing into the bay. They produce 4 species of salmon along with rainbow, steelhead, cutthroat, and Dolly Varden. The late run of coho in the Berners River provides an important food source for the numerous brown and black bears.

Calder/Holbrook

An area of 62,335 acres located on northwest Prince of Wales Island and north Kosciusko Island. A high value wildlife area; it supports some of the highest numbers of deer on Prince of Wales Island. Also, it provides excellent habitat for black bear, marten, and river otters. Migratory waterfowl concentrate on the estuarine sedge-grass flats at the head of Calder Bay; Buff Island has a seabird colony and harbor seal haul-out. The area is used primarily by residents of nearby Point Baker, Port Protection, and Edna Bay. As the amount of high quality wildlife habitat is reduced on nearby areas by timber harvest, this area will become more valued for its wildlife habitat. Many productive fish streams are found here supporting pink, chum, and coho salmon along with rainbow, steelhead, cutthroat, and Dolly Varden. Shipley and Sutter drainages support especially good runs of sockeye salmon. Herring spawn in Labouchere Bay; dungeness crab mature in several of the bays.

Chichagof

A portion of central Chichagof Island (353,540 acres) that extends from Icy Strait to upper Hoonah Sound. The area includes some of the more important fish and wildlife areas on Chichagof Island, including Idaho Inlet, Port Althorp, Goose Flats, Crab and Seal bays, Lisianski River, and upper Hoonah Sound. Excellent brown bear habitat throughout - the protection of this area would help insure the long-term maintenance of a healthy brown bear population on Chichagof Island. Port Althrop is closed to bear hunting to promote viewing. Some of the highest deer densities in southeast Alaska are found in this area, especially in upper Hoonah Sound and Tenakee Inlet. Also, the area provides excellent habitat for marten, river otters, bald eagles, waterfowl, and numerous forest birds. Sea otters are found in Port Althrop. The fish resources are great. The Lisianski River is one of the top 5 salmon producers in the region. It also has substantial populations of rainbow, steelhead, cutthroat, and Dolly Varden. The Trail River in Idaho Inlet is one of the top 5 pink salmon streams on Chichagof Island. The area contains numerous other productive bays, rivers, and lakes.

Chuck River

An area of 125,574 acres located on the mainland coast south of Juneau. A high value fisheries area, Chuck River is one of the highest producers of pink salmon in southeast Alaska. Also, it supports high populations of 4 other salmon species along with rainbow, steelhead, cutthroat, and Dolly Varden. Because of the rich fisheries resource, the area supports good populations of black bear.

Kadashan

A high value fish and wildlife area of 33,641 acres located on the south side of Tenakee Inlet across from the community of Tenakee Springs. An extremely rich and diverse wildlife area, Kadashan provides habitat for one of the highest density brown bear populations in Southeast. Also, it has some of the highest density deer populations in Southeast along with abundant numbers of marten, river otters, and waterfowl. The Kadashan River is one of the top 5 producers of pink salmon in

Southeast, and it is among the top 10 chum salmon producers. The drainage also supports high numbers of coho salmon along with rainbow, steelhead, cutthroat, and Dolly Varden. Because of the abundant fish and wildlife resources, Kadashan has been the site of numerous research projects including long-term monitoring of fish escapements.

Karta River

An area of 38,671 acres located on central Prince of Wales Island. A high value fish and wildlife area, the Karta River is one of the most productive anadromous fish systems on Prince of Wales Island. A high producer of pink, chum, and sockeye salmon, the drainage also supports rainbow and cutthroat trout, spring and fall steelhead runs, and Dolly Varden. An excellent black bear and marten area, it also supports moderate numbers of deer, wolves, river otters, bald eagles, and wintering trumpeter swans. The estuary is important for waterfowl along with shrimp and dungeness crab. A high recreational use area, the Forest Service maintains 4 cabins and a trail system.

Kegan Lake

A highly scenic area of 23,858 acres located on southeastern Prince of Wales Island. The area is considered high value for fish and wildlife. The 3 large lakes, river, tide flats, and extensive alpine areas provide a scenic setting for fishing, hunting, and other forms of outdoor recreation. It is an important area for black bear, marten, and river otters. The lakes and stream are known for their excellent trout and salmon fishing - rainbow, steelhead, coho, cutthroat, and Dolly Varden. The sockeye salmon escapement is one of the largest on Prince of Wales Island.

Naha River

An area 31,926 acres located north of Ketchikan on the northwest side of Revillagigedo Island. A beautiful watershed of small lakes, connected streams, and a semi-saltwater lagoon, it is a high value fish and wildlife area. The area is known for its steelhead fishing along with being a productive pink and sockeye salmon system. Several cabins have been built in the area to provide for recreational use, primarily by residents of Ketchikan. The area contains high numbers of black bears, marten, and river otters along with moderate numbers of deer, wintering trumpeter swans, and wolves.

Nutkwa

An area of 53,635 acres located on southwestern Prince of Wales Island south of the community of Hydaburg. A highly productive fish resource - all species of salmon are found here except kings - and a major producer of pink salmon. Cutthroat, steelhead, rainbow trout, and Dolly Varden are also found in high numbers. The area provides excellent habitat for black bears, marten, and river otters; moderate numbers of deer, wolves, and bald eagles are present.

Outside Islands

A group of islands, including Noyes, Baker, Lulu, and San Fernando (95,524 acres), off the west coast of Prince of Wales Island. The islands are in the midst of a major commercial fishing ground. The scenic coasts of these outer islands are becoming more popular for trips by tourists from nearby fishing lodges. The rugged coasts of these islands provide nesting habitat for the rare peregrine falcon and haul-out areas for sea lions.

Pleasant/Lemesurier Islands

Two islands of 15,527 acres located in the middle of Icy Strait south of Gustavus. These islands are important deer hunting areas for residents of the community of Gustavus. Portions of the islands have been recommended as a research natural area because of unique plant communities.

Point Adolphus/Mud Bay

This area of 72,091 acres on the northern end of Chichagof Island, located west of the community of Hoonah, has become a favorite location for tourists to watch humpback whales during the summer. Because of the large intertidal mud flats and estuary habitat, the area supports high numbers of brown bears and waterfowl. Also, marten and river otters are abundant in the area. In the past, the Mud River drainage has been one of the largest producers of pink salmon in northern Southeast.

Port Houghton

An area of 59,712 acres located on the mainland coast north of Petersburg. A high value wildlife area, it is especially known for its cinnamon phase of the black bear. One of the few timbered bays on the mainland, it provides high quality habitat for marten, river otters, and wolves. The upper part of the bay has sandbanks that provide nesting habitat for arctic terns and other birds. The steep, forested mountain slopes provide good winter habitat for mountain goats. In 1987, Sanborn Creek had the 8th highest pink salmon escapement in Southeast.

Rocky Pass

A unique strait between Kuiu and Kupreanof islands, Rocky Pass (74,423 acres) has been described as a "salt water river". The waters provide some of the most important waterfowl habitat in southeast Alaska. The adjacent shores are excellent black bear and furbearer habitat. Because of the protected waters, Rocky Pass receives extensive human use, primarily by resident of the community of Petersburg. Prior to the hard winters of the early 1970's, the area was noted for its excellent deer hunting. Many streams drain into Rocky Pass; Tunehean Creek is one of the best pink salmon streams on Kupreanof Island and Kushneahin Creek is one of the best sockeye streams.

Sarkar Lakes

A high value fish and wildlife area of 23,500 acres located on north Prince of Wales Island near Naukati. Because of the rich fishery resource, the area receives extensive human use. The Sarkar Lake system has all species of salmon except kings. Cutthroat, steelhead, rainbow, and Dolly Varden are common throughout the system. Harbor seals can be observed in the lake along with wintering trumpeter swans. The adjacent forests provide good habitat for black bear, marten, and deer. Because much of the surrounding area has been impacted by timber harvest, the importance of this area as wildlife habitat has been heightened.

South Etolin Island

An area of 81,939 acres located south of Wrangell and north of Ketchikan. South Etolin contains the only elk in southeast Alaska; they were transplanted here in 1986 from Oregon. The area contains excellent habitat for furbearers; it also has wolves, black bears, and deer.

South Kuiu Island

The southern portion of Kuiu Island (190,301 acres) contains excellent black bear and furbearer habitat. As sea otters expand their range, this area will become an important area for them. Prior to the hard winters of the early 1970's, the area was important for deer hunting; recently, deer have been hunted on Conclusion Island, primarily by residents of Point Baker and Port Protection. The area contains several anadromous fish streams - Bear Harbor Creek is the best pink and coho stream on Kuiu Island.

Sullivan Island

An island of 3,985 acres located in Lynn Canal south of Haines. Deer were transplanted here in 1951. Now, the area provides the only nearby deer hunting for the residents of Haines. Sea lions use the island for a haul-out.

Trap Bay

A small, scenic watershed (6,446 acres) located on the south side of Tenakee Inlet across from the community of Tenakee Springs. The area provides excellent habitat for deer, marten, river otters, and brown bears. The river that runs into the bay supports moderate populations of coho, pink, and chum salmon along with Dolly Varden. Hydrologic and fisheries research has been conducted in the area over the last decade.

West Duncan Canal

A highly scenic and popular hunting and fishing area of 118,812 acres located on Kupreanof Island near Petersburg. A high fish and wildlife area, it contains important black bear and furbearer habitat. Also, it is a major waterfowl area. Over 20 anadromous fish streams flow into the canal. The Castle River supports an excellent spring steelhead and cutthroat trout fishery; it is one of only a few systems in Southeast large enough to overwinter cutthroat, Dolly Varden, and steelhead. Kahsheets Creek is the best sockeye stream on Kupreanof Island; Salt Chuck Creek is one of the best coho streams on Kupreanof.

Yakutat Forelands

The 232,962 acres of the Yakutat Forelands is some of the most diverse and productive fish and wildlife habitat in southeast Alaska. The primary river systems - the Italio, Akwe, and Ustav-Tanis - produce all 5 species of salmon, particularly coho and sockeye. These systems are also good for rainbow, steelhead, cutthroat, and Dolly Varden. These river systems provide for a substantial commercial, sport, and subsistence harvest. The Yakutat Forelands provide habitat for the largest moose population in southeast Alaska and some of the most important breeding habitat for trumpeter swans. The Yakutat Forelands provide abundant habitat for brown and black bears, marten, river otters, wolves, and bald eagles. They are also an important stopping point for migrating waterfowl.

Young Lake

This portion of northeast Admiralty Island (18,173 acres) is a high value fish and wildlife area. Admiralty Creek and adjacent streams produce 3 species of salmon - pink, coho, and chum - along with substantial numbers of steelhead, cutthroat, and Dolly Varden. The area supports high numbers of brown bears, deer, marten, and river otters. The expansive estuary and sand spit system provide excellent habitat for migrating and resident waterfowl. Because of its close proximity to Juneau and the 3 Forest Service cabins, this area receives a high amount of recreational use.

From ADF&G Reports

Salmon Bay VCU# 534

Located on the northeast portion of Prince of Wales Island. This area contains combination of heavily forested mountains and much lower level scrub muskeg complex.

Salmon Bay is the best remaining area on northern Prince of Wales Island which has not been cut. The extensive estuarine system provides excellent waterfowl and black bear habitat. It has always been one of the better deer areas on Prince of Wales Island. Swans sometimes winter on Salmon Bay Lake. Although relatively small, it is one of the highest value wildlife areas on Prince of Wales Island.

Salmon Bay watershed is presently the largest documented sockeye salmon producer on northern Prince of Wales Island. It contributes a significant portion of sockeye, coho, pink, and chums to the commercial gillnet fishery. Rearing habitat is extensive. An undetermined amount of salmon and trout rear in this drainage.

It is one of the major coho producers in southeastern Alaska.

ACREAGE AND TIMBER BASE SUMMARY

Area Protected	Total acres	Scheduled Annual Timber Volume mmbf/yr
Anan Creek	38,415	0.00
Berners Bay	46,147	0.04
Calder/Holbrook	68,693	4.53
Chichagof	347,771	8.11
Chuck River	125,233	3.51
Kadashan	34,204	2.50
Karta River	39,886	0.00
Kegan Lake	24,990	0.00
Naha River	31,821	0.00
Nutkwa	52,674	2.83
Outside Islands	98,608	3.51
Pleasant / Lemesurier/Inian Is.	23,140	0.00
Pt. Adolphus / Mud Bay	73,524	4.09
Port Houghton / Sanborn Canal	58,915	1.27
Rocky Pass	76,368	0.00
Sarkar Lakes	25,650	0.00
South Etolin Island	83,642	0.00
South Kuju	191,565	7.55
Sullivan Island	4,032	0.35
Trap Bay	6,667	0.65
West Duncan Canal	134,680	4.64
Yakutat Forelands	220,278	3.75
Young Lake	18,726	1.35
Salmon Bay Lake	15,000	1.00
TOTAL	1,840,629 acres	49.68 mmbf/yr.

COMMERCIAL FOREST LAND SUMMARY

Area Protected	Total CFL[1] acres	Suitable CFL[2] acres	Economic[3] acres
Anan Creek	8,923	0	0
Berners Bay	7,178	208	176
Calder/Holbrook	36,288	18,821	5,506
Chichagof	97,200	37,139	9,852
Chuck River	47,941	19,915	358
Kadashan	17,787	10,570	3,065
Karta River	24,159	0	0
Kegan Lake	11,305	0	0
Naha River	19,329	0	0
Nutkwa	24,758	12,526	5,271
Outside Islands	52,185	18,569	1,940
Pleasant / Lemesurier /Inian	6,620	0	0
Pt. Adolphus / Mud Bay	26,777	18,491	5,070
Pt.Houghton /Sanborn Canal	10,377	7,958	282
Rocky Pass	23,954	0	0
Sarkar Lakes	11,389	0	0
South Etolin Island	38,640	0	0
South Kuiu	105,563	38,720	3,288
Sullivan Island	3,100	2,668	0
Trap Bay	4,471	2,704	810
West Duncan Canal	41,556	23,648	2,229
Yakutat Forelands	29,232	20,028	9,952
Young Lake	9,887	5,664	1,229
Salmon Bay Lake	8,466	5,000	1,000
total	667,085 acres	242,629 acres	50,027 acres

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[1] Defined by Forest Service as land with a volume of timber greater than 8000 board feet per acre.

[2] Forest Service estimate of acres that meet the criteria for harvest and are available under TLMP land allocations.

[3] Suitable CFL with volumes per acre of 30,000 board feet or greater. Tongass logging from 1955 to present has averaged almost 50,000 board feet per acre.

United States Department of Agriculture
Forest Service
Alaska Region
P.O. Box 21628
Juneau, AK 99802-1628

Reply to: 1920

Date: DEC 16 1988

Mr. Bart Koehler
Executive Director
Southeast Alaska Conservation Council
P.O. Box 1692
Juneau, AK 99802

Dear ~~Mr. Koehler~~ BART:

The information on operable and suitable acres and annual volumes by VCU on the Tongass National Forest that was provided to you on August 4, 1987, is still the most current information available. As you know, we are in the process of building a newer data base in the revision of the Tongass Land Management Plan. However, until the revision is completed, we will continue our management under the current plan, using the data on which it is built. When updated data on the Tongass is available, we will be glad to share it with you. Please let me know if you have further questions.

Sincerely,

Lynn

G. LYNN SPRAGUE
Deputy Regional Forester

FS-6200-28(7-82)

USDA SUPPLEMENT
TO STATEMENT OF GEORGE M. LEONARD, ASSOCIATE CHIEF

WILDERNESS AREA ANALYSIS
DIRECT AND INDIRECT EFFECTS ON TIMBER

NAME	TOTAL ACREAGE	ACRES CFL	ACRES SUITABLE	ASQ (MMBF)	LUD1 ASQ	LUD2 ASQ	INDIRECT CFL	INDIRECT SUITABLE	ASQ
Yakutat Forelands	298,870	79,300	32,400	9.97	0	.9	17,470	14,880	4.14
Berners Bay	48,147	7,170	380	.84	0	.30	0	0	0
Young Lake	16,700	6,097	5,004	1.35	0	0	0	0	0
Chichagof	347,771	97,300	37,180	8.11	0	2.68	14,750	6,413	1.17
Kadashan	34,904	17,767	10,570	3.5	0	0	10,047	7,400	1.46
Trap Bay	6,097	4,471	2,704	.65	0	0	3,310	2,813	0.81
Chuck River	108,300	47,041	10,916	3.01	0	1.20	0	0	0
South Kuiu	101,300	105,300	30,700	7.35	0	2.65	10,685	6,075	1.20
Rocky Pass	78,300	35,004	0	0	0	2.60	14,080	8,770	1.50
West Duncan Canal	104,000	41,500	22,945	4.81	0	0	12,400	8,880	1.51
South Etolin Is.	60,940	30,940	0	0	4.0	0	8,770	4,470	.58
Naha	31,871	10,320	0	0	0	3.00	0	0	0
Calder/Holbrook	66,000	30,300	16,031	4.20	0	0	30,400	32,001	5.13
Sarkar Lake	30,000	11,300	0	0	0	1.40	0	0	0
Outside Islands	96,000	56,140	16,000	3.01	0	0	0	0	0
Karta River	30,000	34,100	0	0	3.85	0	0	0	0
Nutkwa	60,674	34,700	12,800	3.50	0	0	1,000	500	.67
Kegan Lake	24,000	11,250	0	0	0	1.20	0	0	0
Anan Creek *	30,440	8,000	0	0	0	.20	0	0	0
Pt. Adolphus / Mud Bay *	79,504	30,777	16,401	4.50	0	0	3,000	2,140	.47
Pleasant/Lemesurier Islands *	16,871	6,000	0	0	0	.70	0	0	0
Sullivan Island *	4,000	2,100	2,000	.30	0	0	0	0	0
Port Houghton/Sanborn Canal *	50,940	16,377	7,000	1.37	0	0	0	0	0
TOTAL	1,621,400	656,700	330,000	85.60	7.85	16.05	169,740	96,300	16.28

* New areas not included in HR 1516.

Alaskans support legislated lands protection in the Tongass National Forest

Alaskans strongly support protection of key fish and wildlife habitat areas by law -- not by temporary deferrals. Alaskans have established an impressive record of support for legislated protection over the past 4 years, including Senate field hearings held in April 1989 in Sitka and Ketchikan.

Southeast Alaskans supporting legislated protection of key areas include:

- The 15 communities of Hydaburg, Craig, Juneau, Elfin Cove, Klawock, Pelican, Petersburg, Point Baker, Sitka, Tenakee Springs, Yakutat, Port Alexander, Gustavus, Kupreanof, and Edna Bay;
- Governor of Alaska (official position of the State of Alaska);
- Tongass Tourism and Recreation Business Associate (representing over 100 tourism and outdoor businesses operating in the Tongass), Alaskans for Responsible Resource Management, and the Southeast Regional Council of Fish and Game Advisory Committees (from every community in Southeast Alaska);
- United Paperworkers International Union Local 962 of Sitka;
- Native organizations -- Central Council of Tlingit-Haida Indian Tribes, Sealaska Regional Native Corporation, Cape Fox Native Corporation, Hoonah Indian Association, and Alaska Native Brotherhood;
- All the region's commercial fishermen's organizations -- Alaska Trollers Association, Petersburg Vessel Owners, United Southeast Gillnetters Association, Southeast Seine Boat Owners and Operators, Southern Southeast Regional Aquaculture Association, and Northern Southeast Regional Aquaculture Association; plus the statewide United Fishermen of Alaska;
- Conservation groups -- Sitka Conservation Society, Pelican Forestry Council, Lynn Canal Conservation, Friends of Berners Bay, Alaskan Society of American Forest Dwellers, Juneau Sierra Club, Narrows Conservation Coalition, Friends of Glacier Bay, Tongass Conservation Society, False Island-Kook Lake Council, Wrangell Resource Council, Taku Conservation Society, Alaska Women in Trees, Juneau Audubon Society, Yakutat Resource Conservation Council, and SEACC.

Only 30% of the high value fish and wildlife habitat in the Tongass was granted permanent protection by the 1980 Alaska Lands Act. Many million dollar salmon streams vital to the commercial fishing industry, prime tourism destinations, and important sport and subsistence hunting areas are currently on the chopping block.

The House-passed bill, H.R. 987, gives lasting protection to the key fish and wildlife habitat areas of great concern to Southeast Alaskans while still keeping an adequate supply of timber available for harvest. The Wilderness provision of H.R. 987 only reduces the amount of potential scheduled timber supply by 11% -- from the present 450 million board feet per year to 400 million. Since the average sawlog volume harvested from 1980-1989 was 295 million board feet per year, this leaves over 100 million board feet per year of timber supply above this average still available for harvest, even permitting an increase in existing Tongass-dependent timber jobs.

(Southeast Alaska Conservation Council (SEACC), phone 202-547-0141)

Southeast Alaska Conservation Council

SEACC • P.O. Box 021692 • Juneau, Alaska 99802 • (907-586-6942)

12/19/89

Memo to: Key House and Senate Staff
From: Bart Koehler
Subject: Lands Proposals and Transportation/Utility Corridors in the Tongass

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During the Conference Committee talks regarding the Tongass, the above topic was discussed. I have attached a copy of a letter from the Alaska Dept. of Transportation to Congressman Don Young, dated Aug.24th, 1989 for your review. Overall, a number of the statements were unfounded. Additionally, several statements weren't even close to being accurate -- when compared to the actual boundaries of H.R. 987. The following comments correspond to the numbered paragraphs in the letter; I'd be happy to go over the details with you:

1. Title XI could apply. Admittedly, the proposals for roads to Haines are problematic. However, such a road will most likely prove to be a pipedream (due to $200 million cost) especially when compared to improved ferry service.

2. A careful review of the maps shows that Corridor #4 is located to the east of the Karta boundary. There is no conflict, even if the corridor is needed.

3. This corridor (#8) is never likely to be built. If somehow it was needed it would barely nick the area. Alternative routes to the South are feasible.

4. # 42 is not needed, and should never be built. The City of Yakutat opposes this road. It would have to be built up the Alsek thru Glacier Bay National Park -- highly unlikely. The plan for servicing a mine in British Columbia has been negated since the operators have selected another route in B.C., to the east. The time frame for this proposed corridor is more than 20 yrs.in the future, if ever.

5. Utility Corridor #14 is not needed, however if it ever were, ANILCA provides for construction of utility corridors within Wilderness Areas. It is also more than 20 years off in the future.

6. A careful look at the maps reveals that Corridor #20 would not be impacted by this lands proposal. Furthermore, there is considerable opposition from Petersburg residents to this road proposal, in the first place.

7. Again, a careful review of the HR 987 boundaries for Sarkar Lakes and for the Calder-Holbrook areas show that there is no conflict with the proposed road corridor (#5) and/or upgrading of this route. Furthermore, Point Baker and Port Protection don't want to a road system built to their communities.

8. The Greens Creek Mine and the Corridor (#31) are not in the proposed area. The map is not accurate as to the location of the mine.

9. Utility Corridor #28 does not cross Trap Bay in any way, shape or form; to avoid potential conflict with Kadashan -- simply re-route the proposed corridor to the east, up the Corner Bay/Corner Creek road system, thru the Kook Creek road system and then on to Sitkoh Bay. (if this were ever needed)

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FALSE ISLAND-KOOK LAKE COUNCIL, Tenakee Springs • LYNN CANAL CONSERVATION, Haines • TAKU CONSERVATION SOCIETY, Juneau
NARROWS CONSERVATION COALITION, Petersburg • FRIENDS OF GLACIER BAY, Gustavus • TONGASS CONSERVATION SOCIETY, Ketchikan
ALASKA SOCIETY OF AMERICAN FORESTDWELLERS, Point Baker • JUNEAU GROUP SIERRA CLUB • YAKUTAT RESOURCE CONSERVATION COUNCIL

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STATE OF ALASKA

DEPARTMENT OF TRANSPORTATION AND PUBLIC FACILITIES

OFFICE OF THE COMMISSIONER

STEVE COWPER, GOVERNOR

P.O. BOX Z
JUNEAU, ALASKA 99811-2500
PHONE: (907) 465-3900

August 24, 1989

The Honorable Don Young
Congress of the United States
House of Representatives
2331 Rayburn Building
Washington, D.C. 20515

Dear Congressman Young:

Thank you for your July 21 inquiry concerning H.R. 987, "Tongass Timber Reform Act," and its possible impact on transportation and utility corridors in Southeast Alaska.

Enclosed is a map of Southeast Alaska illustrating 44 individual corridors that have been cooperatively and mutually identified in 1987 and 1988 by a team of high-level representatives from public and private agencies in the region. Also enclosed is a supporting document that describes each corridor, the major activities which could stimulate development within the corridors, agencies directly involved in those activities, and an estimated time frame in which significant activity might occur. This information was developed in an effort to coordinate planning activities, share resources, and hopefully, reduce development costs when actual improvements are finally realized. While these documents have not been formally approved or adopted by any agency and are not, therefore, "official" in nature, they do represent a strong sense of direction by participating agencies.

Referring to the wilderness area and corridor maps, corridors that would be affected by the proposed wilderness designation of H.R. 987 include the following:

① BERNERS BAY - This selection would impact corridor Nos. 35 and 36. Absent authorization under Title XI of ANILCA, it would eliminate the Lynn Canal eastside road and utility corridor as one alternative for road access to Juneau and a power grid connection between Whitehorse and Southeast Alaska. Several mining companies are also conducting site feasibility studies at the north end of Berners Bay, and if the decision is made to go into production, extension of the existing road and utility system through the Berners Bay selection may be necessary.

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② KARTA RIVER - This selection on Prince of Wales Island would impact road corridor No. 4 between Hollis and Thorne Bay. If the existing Hollis Ferry Terminal were relocated to Tolstoi Bay in order to provide mainline ferry service to Prince of Wales Island, this road alternative may be justified.

③ NAHA RIVER - This selection on Revillagigedo Island could impact road corridor No. 8 which would provide road access from Ketchikan, through the Bradfield River valley, across the border at Craig River, connecting with the Cassiar Highway via the Iskut River.

④ YAKUTAT FORELANDS - This selection near Yakutat could impact road corridor No. 42. This corridor would provide road access from Yakutat through the Alsek River valley to the Alaska Highway.

⑤ ANAN CREEK - This selection, south of Wrangell, would impact utility corridor No. 14 which extends from Cleveland Peninsula easterly to the existing Tyee Lake power plant. This corridor is part of the proposed southeast power grid designed to bring excess power from Tyee and Swan Lake power plants to communities currently using diesel power generation.

⑥ WEST DUNCAN CANAL - This selection west of Petersburg could impact road and utility corridor No. 20. This corridor provides for road access between Petersburg and Kake in addition to Tyee and Swan Lake power distribution to Kake.

⑦ SARKAR LAKES AND CALDER/HOLBROOK - These two selections on Prince of Wales Island would impact corridor No. 5 and compromise upgrading of the existing logging road that serves communities on the north end of the island.

⑧ YOUNG LAKE - This selection on Admiralty Island would impact utility corridor No. 31 between Young Bay and the Greens Creek Mine. This corridor is a part of the proposed southeast power grid to supply Snettisham power to the mine site.

⑨ TRAP BAY AND KADASHAN - This selection on Chichagof Island would impact utility corridor No. 28 between Sitkoh Bay, Tenakee Springs, and Hoonah. This corridor is part of the proposed southeast power grid to supply power to communities currently using diesel power generation.

As you know, Governor Cowper has endorsed key elements of the Southeast Conference compromise proposal as an alternative to H.R. 987 and other pending Tongass reform legislation. One element of the proposal would designate 12 areas in southeast Alaska with a special Congressionally-protected status that would

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permanently prohibit commercial timber harvesting. Less restrictive than wilderness designation, this status would allow other compatible multiple use activities as described in Land Use Designation II of the 1979 Tongass Land Management Plan. Management of LUD II areas would permit roads authorized for activities such as mining, power and water developments, acquaculture developments, and vital transportation system linkages. Included in the Southeast Conference proposal are the following areas: Berners Bay, Karta, Yakutat Forelands, Mt. Calder-Mt. Holbrook, Young Lake, Trap Bay, and Kadashan.

I hope you find this information useful. As Tongass reform legislation works its way through Congress, I offer any assistance I can give in coordination with the Governor's D.C. office.

Sincerely,

Mark S. Hickey
Commissioner

Enclosures

cc: The Honorable Ted Stevens, United States Senate
The Honorable Frank H. Murkowski, United States Senate
The Honorable Steve Cowper, Governor

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Southeast Alaska Conservation Council
SEACC • P.O. Box 021692 • Juneau, Alaska 99802 • (907-586-6942)

Washington, D.C. Office:
c/o National Audubon Society
801 Pennsylvania Avenue, S.E.
Washington, D.C. 20003
(202-547-0141)

February 12, 1990

The Honorable Bennett Johnston
U.S. Senate
Washington, DC 20510

Dear Senator Johnston:

The recent switch in the Southeast Conference's position on Tongass reform has caused a considerable flap in Alaska and some confusion in Washington, DC. I wanted to give you SEACC's observations on past and recent events.

When did the Southeast Conference first become involved?

In September 1988, Senator Murkowski asked the Southeast Conference, a regional chamber of commerce, to develop a position on Tongass reform reflecting the broad array of Southeast AlaskaN interests. The Conference adopted an official position in March 1989 after nearly seven months of discussion and consultation with Southeast Alaska communities.

How was the Conference's original position put together?

The Conference board established a Tongass Committee to develop its original position. This committee was made up of one former mayor (Bill Privett of Wrangell, then chairman of the full Conference) and four elected community officials (McKie Campbell of Juneau, Reuben Yost of Pelican, John Dapcevich of Sitka, and Ralph Gregory of Ketchikan).

At the outset the Committee made it clear that it would find its own middle ground based on what was good for the communities as whole entities -- not what the timber industry wanted and not what environmental groups wanted. To get the facts and views of all concerned, the committee repeatedly sought comments from all Southeast communities and met for days with the Forest Service, Alaska Loggers Association (ALA), SEACC, and others. "Our goal was to craft a Tongass position for the people of Southeast, not just for the timber companies or the conservationists," said McKie Campbell in an AP story.

Working from 12 consensus points, the Tongass Committee arrived at its position after 18 weeks of work. "We have reached out to

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the communities while working long and hard in developing this consensus position," said Ralph Gregory, Tongass Committee chairman in February, 1989. "I believe it is a fair, reasonable, and critical position."

The full board adopted the committee's proposal. "The set aside of 12 areas is of great import to many communities and while it somewhat reduces the timber base, is essential to our position," wrote the Southeast Conference in its official position statement of March 10, 1989.

What was included in the original position?

The final position had five key points: 1) "Up to" 4.5 billion board feet per decade of timber could be offered ... 2) An economic diversification fund would be established; 3) An intensive timber management fund would be established; 4) Undesignated lands could be traded; and 5) 12 areas would be permanently set aside from logging (to be managed under the Forest Service's current LUD II management prescription).

The Tongass Committee and Conference board agreed that a change in one of the five key points would negate the entire position. While the timber industry opposed both the "up to" language and the set-asides, the Conference refused to make any changes until recently. It is the land set-asides that have now been changed.

Built upon community recommendations, the original position proposed that 12 areas be set aside from logging and logging roads. Selection of these areas was primarily based on their importance to communities for commercial fishing, tourism, subsistence hunting and fishing, sport hunting and fishing, and recreation.

Each proposed area was established primarily on a watershed basis and specifically identified by Forest Service VCUs. VCUs (Value Comparison Units) are the fundamental mapping unit for land allocation and analysis in the existing Tongass Land Management Plan. There are 867 VCUs in the Tongass. Each is a distinct, definable unit, color coded on the maps along with its own number (contrary to recent charges that the boundaries of these areas were vague). In the few cases where partial VCUs were included, definable boundaries and acreages were used.

Who supported the original Conference position?

Four communities -- Juneau, Petersburg, Wrangell, and Sitka -- took official positions, either by letter or resolution, supporting the original Southeast Conference position. Juneau's

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resolution asked that the Mansfield Peninsula (on Admiralty Island) be added to the list of set-aside areas.
Many communities believed the Conference position did not protect enough lands or did not include strong enough reforms, but felt that it was at least a good start. These communities chose to be neutral to the Conference position and took no official action.

No community officially opposed the original Conference position.

Alaska Governor Steve Cowper supported the Conference position. He testified for its adoption as legislation at the Senate field hearings in Sitka and in letters to Congressional leaders.

SEACC believed the Conference position did not go far enough. At the time we said, "These policies are a good effort aimed at more balanced management of the Tongass. This goes a long way toward reflecting the desires of the smaller communities that are not dependent on timber cutting."

Rep. Young was on the radio supporting the Conference position and Senator Murkowski told conference members in a telephone conference call that he would introduce it as a Senate bill. Senator Stevens did not take any position that SEACC is aware of.

The Alaska Loggers Association (ALA), however, strongly opposed the land set asides and the "up to" 4.5 billion board foot timber supply language. ALA began pressuring the Conference to change its position and succeeded in forcing the board to re-consider its position with a second vote. The basic position was passed again with a 7-4 vote.

In between the two votes, Young and Murkowski's promises of support dissolved into opposition.

Why did the Conference change its original position?

"It is our understanding that the revisions to these areas were, in large part, the result of a coordinated effort put forth by the Alaska Loggers Association (ALA), of which Goldbelt is a member," wrote Goldbelt President Joseph Wilson in his January 23, 1990 letter supporting changes to the Conference position.

ALA never gave up pressuring the Southeast Conference. It is no secret that these changes were generated by the timber industry, and not by elected officials from communities. With newly elected board members in sympathy with ALA, the result was predictable.

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How was the new position developed?

In sharp contrast to the original, the Conference's new position was developed by the timber industry and railroaded through for adoption in just seventeen days.

On January 17, 1990, Senator Murkowski gave a speech to the Ketchikan Chamber of Commerce where he asked the Southeast Conference to revisit its position. In a January 18th letter, new board member Dick Griffin asked the Conference to consider changes. The specific changes were first presented at a meeting on January 23rd and communities were given one week to comment. Senator Murkowski formally urged the Conference to "clarify" its position in a letter dated January 26. The changes were adopted by the board on February 2 by a 9-2 vote.

According to a press account of the January 23 meeting, Ralph Lewis, a Ketchikan Pulp Company employee and Southeast Conference board member, stated that he and members of Senator Murkowski's staff prepared the new proposal. This was done without the knowledge of some board members, who received the new proposal anywhere from one week to one day prior to the meeting.

What are the changes?

The new Southeast Conference position is being portrayed as something that will "clarify" set-aside boundaries and protect additional areas of concern to communities. Instead, it guts the watersheds which are of the greatest concern to small communities while adding four other areas. Four of the premier salmon producing watersheds now have their river valleys removed from set-aside status. The additions were simply a sop for covering up the industry's blatant attempt to get at the timber in these key river valleys regardless of the negative effects on fish and wildlife and the communities dependent on those resources. Additionally, one of the new areas -- Idaho Inlet -- was also gutted, while the Conference claimed to be responding to Elfin Cove's concerns.

The maps for the new position are nearly identical to ALA proposals and maps offered by Senator Murkowski during the 1989 Conference Committee. Furthermore, under the new Conference position for the Lisianski River, Upper Hoonah Sound, and Trap Bay, logging areas are virtually identical to the proposed logging plans for Alaska Pulp Corporation's 1986-90 EIS. The Conference's new proposal also closely resembles earlier Alaska Pulp plans for heavily logging the Kadashan watershed.

Attached for your review is a memo from the Alaska Department of Fish and Game detailing the effects the changes would have on

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each of the area's fish and wildlife. "The best wildlife habitat has been targeted," says the memo. "Important wildlife habitat would be completely removed." Fish and Game termed some of the proposals examples of "the worst possible wildlife management."

Some of the worst proposals are for:

Nutkwa -- cut by half; virtually all of the main river watershed and tributaries are removed.
Kadashan -- cut by more than half; key habitat and riparian zones eliminated.
Chuck -- cut by more than half; almost all the river is excluded.
Calder-Holbrook -- cut by more than half; Mt. Calder and Mt. Holbrook excluded from proposal.
Trap Bay -- cut by half; core area removed.
Karta -- cut by more than half; important tributary valleys removed.
Lisianski and Upper Hoonah Sound -- cut by 25%; removed is all of Finger Creek, plus the Lisianski River valley, Upper Hoonah Sound valleys, and Patterson Bay valleys.
Idaho Inlet -- key riparian zone along the Trail River gutted.

The new changes were justified by noting that buffers would protect the streams. There are several problems with this. First, the Southeast Conference position does not include adoption of no-cut buffer zones. Second, buffers are a minimum management standard for retaining salmon habitat in areas that are logged. They do not protect habitat important for wildlife, water quality, recreation, and subsistence; nor do they maintain the integrity of important watersheds. Therefore, buffers cannot substitute for protection of entire watersheds.

Frankly, it would be more honest for the Southeast Conference to exclude the areas entirely, because gutting these riparian, high volume, old-growth critical habitat areas destroys the integrity of these watersheds.

What was the response to the new proposal?

The one week official written comment period was established to seek the views of Southeast Alaska communities. The results were:

Favoring the changes:
The mill towns of Wrangell and Metlakatla.

Opposing the changes:
Juneau, Petersburg, Hydaburg, Tenakee Springs, Pelican, Elfin Cove, Pt. Baker, Kupreanof, Port Alexander, Craig, Thorne Bay, and Gustavus.

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Attached are copies of the written responses from communities. At this writing, there is confusion over the official positions of Sitka, Haines, and Ketchikan. They have yet to provide written responses and it is unclear if they were officially represented at the February 2 meeting. (Their chambers of commerce were, but we're not certain about their cities' positions.)

"This new position has not gained widespread support," said Governor Steve Cowper when the State of Alaska rejected the Conference's changes. "The original reform package is a well-reasoned and fair compromise and comes closer to satisfying the concerns of a majority of affected Alaskans."

In a letter to the board, Jim Ayers, former Southeast Conference executive director, said the proposed changes were the result of pressure by the timber industry and Senator Murkowski. "Clarification is a hoax being perpetrated on the Alaskan people and you are being asked to play a leading role."

"The Conference does not at this time represent communities or the people of Southeast Alaska," stated Ralph Gregory, Ketchikan Borough mayor and former chairman of the Tongass Committee. "A municipality representing thousands of people has a single vote," wrote Gregory in a letter published in the Ketchikan Daily News. "The same vote is available to any individual paying dues. This has, in a practical sense, disenfranchised whole communities who now are outvoted by individuals representing special interests or simply their own."

"It is clearly a timber industry proposal," says Reuben Yost, former mayor of Pelican and member of the Tongass Committee. He called the one week comment period a "sham."

Kate Troll of the Southeast Alaska Seiners Association (a leading commercial fishing group) said the new changes are not just a matter of boundary adjustments. "They are proposing to pretty much eliminate the heart of five fisheries systems -- Lisianski, Kadashan, Nutkwa, Karta and the Chuck River."

No doubt the Conference board will tout the total number of comments they received. Most were form letters from logging industry employees and petitions from logging camps -- half of which were out-of-state loggers.

Summary

Columnist John Greely summed the situation up well when he wrote: "This is all politics as usual. From that viewpoint, it's smart for Murkowski to insist on a 'clarification' from the Southeast

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Conference. But the move shouldn't fool anybody in Washington. It certainly didn't fool anybody back home."

Overall, the new Conference position has been officially rejected by the communities comprising the majority of Southeast Alaska's population, as well as the State of Alaska.

It is clear that the Conference's shift in position represents a shift of only one group (the Conference), not a shift of public opinion in Southeast Alaska.

Best regards,

Bart Koehler

Bart Koehler
Executive Director

Attachments

* Addendum: The Sitka City Council, with a number of its members upset by the changes, has not, as of February 23, 1990, supported the new Southeast Conference position. Sitka, a pulp mill town and strong supporter of the timber industry, is still on record as supporting the Conference's original compromise.

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United States Department of Agriculture
Forest Service
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Reply to: 1920-2

Date: FEB ·6 1990

Subject: Implementation of Forest Plans

To: Regional Foresters, NFS Staff Directors

Some confusion continues to exist between the "analysis" required by the NFM planning process and the "analysis" required by the NEPA. The purpose of th letter is to clarify the difference so implementation of Forest plans may mo more smoothly. We also believe that there is some inappropriate midlevel decisionmaking taking place; i.e., functional analysis and "area analysis." You need to give specific attention to determine if this problem exists with: your Region and develop an action plan to remedy the situation if it exists.

Implementation of Forest plans is the process of selecting, scheduling, budgeting, monitoring, and evaluating management practices. Analysis, in addition to that required within the NFMA planning process, may be required a the implementation stage to fully integrate all resources and to evaluate cumulative effects and interconnected actions. This is often referred to as "area analysis" or "opportunity area analysis" which are terms easily misunderstood and therefore confusing. This analysis is not NEPA disclosure of a proposed action; rather it is a management exercise that focuses management attention on established priorities, refines the resource integration objectives of Forest plans, and assesses future budgeting requirements. The NEPA disclosure requirements apply only when we want to implement a defined action.

There are only two levels of decisions in planning for units of the National Forest System. These are (1) approval of the Forest plan and (2) approval of management practices that implement the plan. We suggest reviewing FSM 1922, 1922.4, FSH 1909.12, and the Flathead decision, pp. 4-9 and 63-69. We must avoid introduction of a third level of planning and decisionmaking. Unfortunately, in some cases, Forest plan decisions are being reexamined on an area-by-area basis, and additional evaluation of functional programs is being conducted on a Forest-wide basis. We should not rehash decisions that have already been made in the Forest plan. However, if new information or conditions exist, it may be appropriate to reconsider plan decisions and amend the Forest plan. This should be the exception, however, not the rule.

The Regions should evaluate their approach to Forest plan implementation by considering the following.

The Forest plan provides direction for all resource programs, practices, uses, and protection measures through establishment of both Forest-wide and management area specific standards and guidelines. The environmental

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consequences of establishing this direction are fully documented in an environmental impact statement that meets NEPA requirements. Normally, the Forest plan and EIS do not contain sufficient detail to determine which specific activities may be undertaken in a site-specific location. Before these decisions can be made, further analysis may be necessary.

The Forest plan implementation process may be illustrated as follows:

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FOREST PLAN DECISION <---------------> NEPA COMPLIANCE
        |                                     |
        |                                     |
        V                                     |
ANALYSIS AND EVALUATION                       |
        |                                     |
        |                                     |
        V                                     V
PROJECT(S) DECISION <----------------> NEPA COMPLIANCE
                                       (TIERING TO THE PLAN)
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Direction is contained in the Forest plan (management prescriptions, standards and guidelines, and schedule of management practices) to achieve the desired future condition of the National Forest described by the plan's goals and objectives. A full array of proposed management practices is available to achieve this desired future. In addition, actions may be proposed by others outside the Forest Service. Additional analysis and documentation of the proposal are necessary before site-specific decisions are made.

Additional management analysis procedures may be used to assimilate management direction, focus management priorities, refine activity schedules, and assess future management requirements. Forests and Districts may use these analysis procedures to identify the timing and location of individual proposed actions.

The NEPA analysis process begins once these individual proposals have been identified. One or more proposals may be addressed in a single EA or EIS if the proposals represent connected or cumulative actions as defined by 40 CFR 1508.25. The disclosure document must address the direct, indirect, and cumulative effects of the proposal(s). Information developed as a part of the management analysis procedures described in the preceding paragraph may be applicable to the NEPA documentation. In addition, the NEPA analysis of the proposed actions should provide the documentary basis for NFMA finding on consistency, suitability, clearcutting and even-aged management, and vegetative manipulation. This NEPA analysis and documentation leads to project decisionmaking that fully complies with NEPA, NFMA, and all other applicable regulations.

Questions or comments may be directed to the Land Management Planning Staff.

JAMES C. OVERBAY
Chief

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United States Department of Agriculture
Forest Service
Washington Office
12th & Independence SW
P.O. Box 96090
Washington, DC 20090-6090

Reply To: 1920

Date: August 1, 1989

Subject: Revision of ~~Forest Plans~~

To: Regional Forester, R-10

During our recent visit on the status of Tongass National Forest Land and Resource Management planning, we agreed to clarify the differences between development of a Forest plan and revision of the plan.

The initial development of Forest plans addressed the question of how the land should be managed. In the revision of a plan, it is not in the public interest to assume that all current commitments and investments are void. The key question during revision of Forest plans is determining the need to change management direction (36 CFR 219.12 (e)(4)). Keeping this perspective in mind, the following clarification should help in applying existing rules and regulations.

The Forest plans established direction guiding how the Forests were to be managed. A critical step during revision of Forest Plans is "a determination of the need to establish or change management direction" (36 CFR 219.12 (e)(5)). The focus of this effort should be determining changes needed to the Forest plan so that it will offer the vision needed for the next 10-year period. The Analysis of the Management Situation (AMS) focuses on this determination.

There are five components of the determination to establish or change direction. They are:

1. Results of monitoring and evaluation (36 CFR 219.12(k))
2. Current direction (36 CFR 219.12 (e)(2))
3. Resource potential (36 CFR 219.12 (e)(1))
4. Projections of demand (36 CFR 219.12 (e)(3))
5. Potential to resolve issues and concerns (36 CFR 219.12(e)(4))

The AMS provides "a determination of the ability of the planning area covered by the forest plan to supply goods and services in response to society's demands" (36 CFR 219.12 (e)). It leads to "a determination of the need to establish or change management direction" as explained above. It is further stated that the "primary purpose of this analysis is to provide a basis for formulating a broad range of reasonable alternatives" (36 CFR 219.12 (e)). Therefore, it is logical that the determination to establish or change direction is to be used as the basis for alternative formulation.

The initial forest planning process was "issue-driven." This was entirely appropriate since current direction was not as clearly defined or visible to the public as it is now. Plan revisions, in contrast, should be driven by the "need to change." The issues and concerns are a major component of the

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determination of a need to change. Therefore, they will not be minimized in importance during revision, but rather framed in context of the existing Forest plan as amended.

With this in mind, there will be differences when doing a revision as compared to an initial Forest plan. For example, the minimum and maximum resource potentials which frame the distribution of alternatives per 36 CFR 219.12(f)(1) should be defined in a revision with respect to the issues and "need to change" rather than the benchmarks. With regard to NEPA, the purpose and need statement in the EIS should focus on those elements of current direction which have been identified in the "need to change" determination. The proposed action is thus defined by only those elements of current direction identified thru the "need to change" determination, rather than all aspects of forest management.

It should be noted that the "need to change" determination in the AMS does not commit the line officer to a decision to alter current direction, but rather identifies those elements of current direction which merit further indepth analysis due to one or more of the five components of the determination highlighted above.

There are certain elements of current direction which must be reevaluated in a revision. These include a determination of lands not suited for timber production and roadless area determinations. Data gathered during plan implementation should be available to assist in making these determinations during revision.

The key point to remember is that a revision is not "zero-based" planning as was the case during initial development of the plans. Instead, it is an opportunity to fully review the plan, updating its direction only as needed. The amount of effort which this will require may vary greatly depending on the circumstances of each Forest. In those instances where the plan has had effective monitoring and evaluation coupled with timely amendments, the revision effort should be considerably less demanding than initial plan development. If this has not been the case, however, or if there has been a major change in conditions or widespread controversy, then the scope of a revision may prove as encompassing as the initial planning effort.

/s/ James C. Overbay

JAMES C. OVERBAY
Deputy Chief

STATE OF ALASKA

DEPARTMENT OF FISH AND GAME

DIVISION OF SUBSISTENCE

STEVE COWPER, GOVERNOR

(K)

BOX 3-2000
JUNEAU, ALASKA 99802
PHONE: (907) 465-4147

January 5, 1990

JAN 10 1990

RECEIVED
JAN 8 1990
REGION I

Steve Brink
TLMP Revision Team Leader
U.S. Forest Service
Juneau, Alaska 99802

Dear Mr. Brink;

The Division of Subsistence takes seriously our role in assisting federal agencies in ANILCA Title VIII implementation. This includes specific direction in Sections 802 and 812 related to cooperation in the conduct of subsistence research, an activity in which this Division has played a lead role. Accordingly, we have closely followed the development of the Tongass Land Management Plan (TLMP) revision. Indeed, Subsistence Division staff and the USFS cooperated in 1988 in a comprehensive regional subsistence survey that was specifically tailored to meet TLMP revision information needs. This study represented a substantial commitment of state and federal resources, with total costs of close to $1,000,000. In the course of several meetings during which I or a member of my Southeast Region staff was present, we discussed ways that this subsistence information could be used in the TLMP revision to insure that subsistence protections were built into Tongass land management decisions.

This history is particularly significant, it seems to me, in the context of the current litigious climate, wherein USFS land planning decisions have repeatedly been challenged on subsistence grounds. I am sure all who participated in our discussions over the past several years believed that the TLMP revision represented a unique opportunity for the Forest Service to fully meet ANILCA subsistence requirements, adequately addressing the subsistence land management concerns that have proven so intractable in Southeast Alaska.

In view of all of this, we find it extremely troublesome that subsistence policy decisions now being made in the course of the TLMP revision contradict many of the agreements that we had taken as signs of progress. We have been informed that the TLMP revision document is now described as "programmatic" and therefore not subject to the requirements of Sec. 810 of ANILCA. Subsistence information that appears in the document will, at best, simply be used to predict generalized effects of allocation alternatives.

Furthermore, future subsistence evaluations will apparently be conducted at the project planning level only, at which point the cumulative effect of land management activities throughout a rural community's subsistence harvest area will not be considered. The TLMP revision, therefore, offers the only opportunity to meaningfully assess long range and cumulative forest management impacts. Department staff have spent a considerable amount of time designing a meaningful approach to this complex analysis. Please refer to our letter of 22 May, 1989, (Bosworth, Reed and Anderson to Brink) for our detailed recommendation on an appropriate Sec. 810 evaluation procedure for the TLMP revision.

These recently revised approaches to National Forest planning and management appear to conflict with the USFS subsistence handbook, which calls for Sec. 810 evaluations and "significant impact" findings as part of draft forest plan development. This procedural handbook was prepared in concert with other

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federal agencies, the Joint Land Use Commission, and the state, at a time when TLMP revision planning had already begun. We can find nothing in ANILCA that would support these basic policy changes, were they to be applied on the Tongass or elsewhere in Alaska. On the contrary, this emerging policy direction appears to us to be contrary to the intent of Congress, and to the public interest. We do not think that anyone will gain from the protracted litigation that could result.

In closing, we urge you to reconsider these ill-advised decisions in regard to the use of subsistence information in the TLMP revision. I am sure I need hardly mention that we would find it very difficult to support the revision process as it as presently developing. This would put us far from the cooperative relationship we assumed two years ago when we began our joint subsistence studies.

Sincerely

Steve Behnke
Director

cc:
Rob Bosworth
Frank Rue
Lew Pamplin
Rick Reed
Dave Anderson
Lana Shea

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Southeast Alaska Conservation Council
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Washington, D.C. Office:
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Washington, D.C. 20003
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MEMORANDUM

TO: Bart Koehler, Executive Director
FR: John Sisk, Consulting Forester
RE: **Point-by-point Critique of Forest Service's AMS Summary, "Understanding the Past . . . Designing the Future"**

PART 1: PAGE SPECIFIC COMMENTS

Page 9

The Forest Service misquoted Marylyn Conley, a SEACC board member from Ketchikan. The quote attributed to Marylyn was made up by agency planners in Juneau and assigned to Mrs. Conley in the publication, which was sent to over 20,000 southeast Alaska residents. Marylyn had formally rejected the manufactured quote in a signed release statement and had, instead, presented a very different, authentic quote in her own words. Additionally, SEACC members and staff specifically reprimanded the Forest Service for attempting to concoct such bogus "public" quotes back in August of 1989. The Forest Service approach to public participation, and the outcome, are cause for concern.

Page 14

The history section of the document is notable in its omission of all historical events that do not support the current Forest Service timber program. A few examples illustrate the point.

1) There is no mention of the 1981 federal court ruling that the two Tongass pulp mills conspired to restrain and monopolize trade, and to reduce competition from Alaskan and out-of-state timber operators. Court documents revealed that 102 independent logging and milling companies had been "forced to bankruptcy, acquired, or otherwise driven from the logging business by the defendants [Ketchikan Pulp Company and Alaska Lumber and Pulp, now Alaska Pulp Corporation]."

2) The history section also ignores the fact that in the 1980s fourteen southeast Alaskan communities expressed formal opposition to the timber supply program set forth in section 705 of the Alaska Lands Act.

3) The Forest Service document ignores the fact that the support for lands protection, via wilderness designation or some other mechanism, is a result of local and regional interest, not some vague national trend. The concept of permanent lands protection is endorsed by the Governor of Alaska, Sealaska Corporation, many local communities, commercial fishing organizations, and SEACC.

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Page 25

Although the Forest Service acknowledges that the Alaska Lands Act recognized subsistence as a priority use of the Tongass National Forest, the Forest Service refuses to comply with Title VIII of ANILCA in the TLMP Revision. The agency's original plan for a detailed analysis of subsistence use of the Tongass has been scrapped in order to meet the short timelines imposed by Forest Service policy makers.

Page 28

The description of issues here is woefully superficial. The Forest Service's inability to acknowledge and grapple with the real issues on the Tongass is a major reason why Congressional reform is so essential to the future of southeast Alaska. The key issues on the Tongass include lands protection, subsistence rights, protection of streamside habitat, high-grading the best wildlife habitat, destruction of key recreation areas, and domination of the Tongass management by fifty-year timber contracts.

Page 31

The "benchmark" analyses being prepared by the Forest Service do not show "what effect it's [a given resource's] production has on other resources." Resource simulation models can show such effects, but FORPLAN benchmarks are not intended for that purpose. For reasons outlined below, the benchmarks summarized in the "user-friendly" AMS are worthless as models of Tongass resource interactions and environmental effects. If these benchmarks "form the foundation for reconsidering how to manage the Tongass National Forest for the next 10 to 15 years" we are in deep trouble!

Page 32

The statement that Tongass wilderness includes 1.5 million acres of old growth forest is misleading. Of this land, less than 8000 acres is land with more than 50 thousand board feet of timber per acre (50 mbf). Outside of wilderness, over half of this most important old growth wildlife habitat, about 100,000 acres, has already been logged; the vast majority of the remaining high volume old growth is presently available for logging.

Page 34

The Forest Service asserts that a small proportion of the forest has been clearcut to date. The agency fails to point out that the roughly 360,000 acres of lands logged since 1950 were, for the most part, prime wildlife habitat. The average volume per acre cut over this period was 50 mbf/acre, which is far greater than the Tongass-wide average of about 21 mbf/acre. In other words, since 1950 the industry has been cutting the very best timber stands, which are also the very best wildlife habitat -- a classic case of mining the high-grade timber at the expense of the future.

The graph presented on this page gives the impression that there's little to worry about -- lots of roadless land left. But if the reader considers the problem of past high-grading and the table on page 32 of the "user-friendly" AMS, it's clear that wildlife habitat is being logged, whereas most of the remaining roadless land is ice and snow, alpine tundra, and rock, along with muskeg and cutover second growth timber stands (referred to as "other forested lands" on page 32). Yes there's a lot of roadless land left, but yes, the valuable fish and wildlife areas, the heart of the Tongass, are being liquidated.

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Page 35

Again, the Forest Service fails to realize that in southeast Alaska lands protection and wilderness equate to food, jobs, income, and cultural tradition -- fish and game for commercial, recreational, and subsistence users. We are not dealing with a simple issue of recreation versus development. This basic misunderstanding is crippling the Forest Service's effort to come to terms with Tongass issues.

Pages 36 and 37

Once again the Forest Service misrepresents the old growth concerns on the Tongass National Forest. The agency refuses to admit that all old growth is not the same: an acre of stunted muskeg pine is not the same as an acre of high volume hemlock when it comes to its value as wildlife and fish habitat.

The real issue is the fate of the biological heart of the Tongass, the 8-13% of the commercial forest land that is the best wildlife and fish habitat, nearly all of which is open to logging and is included in annual timber sale calculations.

Pages 40 and 41

The Forest Service explains the value of the salmon fishery to southeast Alaska, but the agency understates the employment and monetary benefit of the fishery. In addition, the text does not reveal that the riparian prescriptions employed in the TLMP Revision and the "benchmark" analyses presented in the AMS both allow logging (clearcutting and selection harvest) as close as 25 feet away from some class 1 anadromous fish streams, allow roads to be built in riparian areas, and grant managers the discretion to modify fish habitat protection standards on a case by case basis. Although most of the benchmarks left the salmon streams uncut, there is still no guaranteed protection.

Page 42

The presentations on wildlife habitat present some useful information but distort and omit other important information. For example, the following information is not included:

1) Brown bear seasons on north Chichagof Island were closed by the state due to heavy mortality related to logging roads, logging camps, and generally increased human activity.

2) The definition of deer winter range is inconsistent with current scientific research, and is inconsistent with the deer habitat model developed cooperatively by the Forest Service and the Alaska Dept. of Fish and Game.

3) Recent Forest Service documents predict that in pulp company logging areas bald eagles, brown bear, black bear, deer, and pine marten populations will plummet as the old growth forest is liquidated and a second-growth tree farm established. Many of these areas are important for subsistence and for rural community stability.

Page 43

Here, the Forest Service acknowledges:

> "Most timber harvest is occurring in high volume stands that are also important for many wildlife species."

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Page 45

The chart and text explain that most of the important recreation places on the Tongass "occur in areas associated with valleys, streams and beach fringes, [and] they also tend to have high values for other resources including wildlife and timber", and that most of these important areas are unprotected and open to logging. **This is an important point: there are trade-offs between recreation, wildlife, and fish, on the one hand, and timber on the other. As discussed below, the "benchmark" analyses fail to present or clarify these trade-offs.**

Page 46

These new "tentatively suitable timber land" acreage figures include a great deal of land where timber is not economic to harvest, and where actually operating a timber sale is not feasible. Neither logging operability or economic efficiency are considered in delineating "tentatively suitable timber." The tentatively suitable lands include a great deal of timber in the 8-20 mbf/acre volume class that is generally not economic to operate. Therefore, these figures overstate the timber base.

The use of the term "suitable for timber harvest" in the pie diagram is an error -- it should say "tentatively suitable." The new category differs from the 1979 TLMP I definition of "suitable" timber. The TLMP I classification considered roughly 1.7 million acres of land to consist of suitable old growth. The TLMP Revision considers suitable timber growing land, regardless of its current inventory status, and also includes lands allocated to Land Use Designation (LUD) II in TLMP I -- the total is some 3.1 million acres. The book keeping method has changed, but the resource supply estimates have not changed much.

The pie diagram presented on page 46 constitutes an extreme misrepresentation of the facts regarding the amount of commercially valuable timber in existing wilderness areas. First, the Forest Service does not distinguish between tentatively suitable and not suitable timber within wilderness. Second, the presentation does not consider timber land **operability.** Third, the relative value of the timber in wilderness is not addressed. **The fact is that, according to existing Forest Service data, only 80,000 acres of wilderness lands have commercial timber that is both commercially important (>30 mbf/acre) and harvestable under current federal standards.**

Page 47

The Forest Service projects that timber demand will remain at "all-time high[s]." This is precisely the sort of reckless optimism that led us into disaster in the first Tongass Land Management Plan, when rosy Forest Service timber demand forecasts were followed in the 1980s by the worst market collapse in history. The Forest Service was totally unprepared to deal with the situation, and continued building "roads to nowhere" and dumping timber sales on a shriveled market. In that case the losers were the American taxpayers, who between 1982 and 1986 lost an average of $50 million a year on the Tongass timber debacle. Why isn't the Forest Service learning from the past and taking a more temperate, adaptable approach this time around?

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Page 48

The net present value figure of $25.6 billion for the 13 "viable" mineral deposits should be considered carefully. For example, this figure, depending on how it is handled in the Forest Service's FORPLAN computer model, could dramatically skew the present net value calculations for benchmarks and management alternatives.

Pages 50 and 51

On these pages the Forest Service presents several phrases and concepts that govern the FORPLAN benchmark analyses. Unfortunately, the explanations are so glib they could be misleading.

For reasons that are explained in my initial critique of the benchmark analyses, the "long-term sustained yield capacity" of the Tongass is a relatively meaningless figure. Simply put, it assumes unlimited expenditures on intensive timber management on every square foot of land capable of growing a tree, with little consideration of practical operational limits, and with no consideration of any other uses of the Tongass at all.

"Non-declining yield" is often called "non-declining even flow" or NDEF. This constraint merely forces the FORPLAN computer model to schedule logging activities so that the annual cut never declines. However, NDEF does nothing to assure that the value of annual logging programs does not decline, which is a big problem.

Dispersion constraints only delay adjacent clearcuts for 10 years, therefore some huge (greater than 1000 acres) de facto clearcuts could be possible over, say, a fifty year period.

Both riparian (stream side, estuarine, and lake side vegetation) prescriptions being used in the plan allow clearcutting and selective logging as close as 25 feet from some types of class 1 salmon streams, allow salvage of timber in and across class 1 streams, and allow road construction and bridges along class 1 streams. In addition, managers may modify stream protection standards on a site by site basis at their discretion.

The concept of "viable wildlife populations" has meaning with regard to biodiversity, habitat fragmentation, and endangered species, but **most Alaskans are concerned with the harvestable surplus**, not minimum viable populations. That is, **most southeast Alaskans are concerned with fish to catch, sell, and eat, and venison for the table -- to protect these interests wildlife and fish populations must be robust, not minimal.**

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PART 2: BENCHMARK ANALYSES

Background

The resource benchmarks in the Forest Service's "user-friendly" version of the TLMP Revision Analysis of the Management Situation are based on the mathematical calculations of a linear program called FORPLAN. FORPLAN is a mathematical sketch of certain resource qualities. Like most sketches, it reflects a certain amount of the world view of its creators: Forest Service timber sale planners. Because it is a mathematical sketch, the legitimacy of the sketch depends on the quality of the numbers that go into its calculations.

The purpose of FORPLAN benchmarks is to describe the maximum productive potential for each forest resource, complying with law but otherwise disregarding other resources. Benchmarks are not intended to describe the resource interactions of the forest ecosystem; they merely set outside bounds for more detailed management alternatives to be developed. FORPLAN analysis is capable of displaying economic information, such as opportunity costs and shadow prices, but this type of work is rarely done in National Forest benchmarks.

FORPLAN itself is actually a large set of tables that list potential resource management activities, such as timber sales, along with each activity's forecasted costs and revenues, as well as other attributes associated with each management option, such as pounds of fish or millions of board feet of timber. The tables are complex, and the values in each table effect the outcome of FORPLAN calculations.

FORPLAN schedules the different possible management options so that the value is maximized, subject to resource and budget constraints. The constraints control how much of what (logging, road building, salmon enhancement projects, etc.) the computer is allowed to schedule when. In addition, since all values are discounted to the present, the discount rate also plays a role in how FORPLAN schedules management options.

The cost & value tables, and the resource/budget constraints determine what FORPLAN does and what the benchmark numbers will look like. The tables are supposed to be based on resource inventories, economic analysis, and mathematical models of future timber growth. The quality of this information is highly variable; the Tongass timber volume class data is very poor, yet it drives much of the timber cost measures and affects the annual sale quantity. A few basic constraints are required by law in benchmarks, but in general benchmark runs are so unconstrained that they tell us little about real forest management options.

General Problems With the Tongass Benchmarks

High Grading and Economic Inefficiency Are Built Into Timber Schedules

All Tongass AMS benchmarks schedule timber sales over a 150 year time frame, and use a 4% discount rate. And, because the Forest Service assessment of tentatively suitable timber land did not address timber operability and did not include an economic analysis, a great deal of very uneconomic timber and timber that is impractical to log is available to FORPLAN to schedule for harvest. Most important, there is no budget constraint in any benchmark, so timber is assumed harvestable regardless of cost --FORPLAN thinks that the taxpayers' pockets are infinitely deep!

FORPLAN chooses the timber harvest schedule that maximizes present net value, subject to a constraint that annual average harvests will not decline over time ("non-declining even flow"). To do this, FORPLAN schedules the most valuable timber for harvest as soon as possible. It schedules the "dogs", sales that lose a lot of money or are otherwise poor investments, way out

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in the future. Why? In 150 years a timber sale that loses one thousand dollars will discount to less than a three dollar loss in present value.

The result is the inclusion of a lot of uneconomic timber in the timber base, which inflates the calculated annual harvest beyond what is realistic. This is one variation of the infamous "allowable cut effect." And, because the Forest Service computer programmers allowed it, the economic effects of uneconomic timber sales are "hidden in the future." The resulting timber schedule is the epitome of mining the old growth timber, high grading the Tongass, and inflating the annual cut, all at tremendous long-term cost to the taxpayer.

How could the benchmark timber schedules be improved? By including a constraint that would prohibit declines in net annual revenue, and/or by dropping the uneconomic timber out of the timber base.

Timber Yield Tables May Contribute to Inflated Cut and High Costs

Because there was no budget constraint in the benchmarks, FORPLAN was free to assume that unlimited funds would be available to grow a second timber crop. "Managed timber yield tables" project tremendous future growth potential, but large investments of tax dollars are required to fund thinning, pruning, and other intensive tree farming activities. Again, this contributes to overstated annual harvests and understated costs. Both unmanaged and managed yield tables for the Tongass are presently being revised by the Forest Service.

The "Long Term Sustained Yield Capacity" Figures Are Pure Fantasy

The "long-term sustained yield capacity" of the Tongass is a relatively meaningless figure. Simply put, it assumes unlimited expenditures on intensive timber management on every square foot of land capable of growing a tree, with little consideration of practical operational limits, and with no consideration of any other uses of the Tongass at all. It is included because it is required to be calculated in all forest plans.

Lack of Timber Demand Cutoff Overstates Timber Value and Demand

For most resources, the Forest Service assumed that at some high level of supply the demand for that resource would drop to zero. However, for timber the agency assumes an infinite demand for Tongass timber. This means FORPLAN thinks all timber scheduled can be sold, no matter how much is offered for sale, what the quality of the timber is, or what the harvest economics are.

Benchmarks Suggest Salmon Streamside Timber Is More Valuable Standing Than Cut!

In every benchmark except the max timber benchmark, FORPLAN decided that salmon streamside timber contributes more to the value of the Tongass when it is left alone than when it is logged. This is reflected, for example, in the fact that the maximum fish benchmark, in which no logging occurred in riparian areas, has a higher present net value than does the max timber benchmark. This is a powerful argument in favor of requiring buffer strips along all salmon streams.

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Unlimited Budget and Salmon Enhancement Assumptions Result in Unrealistic Salmon Production and Employment Numbers

How is it that even for the max timber benchmark, which would cut 780 million board feet of timber each year in perpetuity, the Forest Service document shows no impact at all on salmon production (see table on page 59), and no change whatsoever in timber employment (see table on page 58)?

Planners told FORPLAN it had unlimited money to spend to produce fish, so the model scheduled all the possible fish enhancement projects in the first decade, assumed funds to maintain and operate them forever, and assumed high levels of fish production. All benchmarks showed salmon production of approximately 130 million pounds per year. This number is closely related to the salmon enhancement projects and their assumed productivity. It does not reflect the effects of logging on existing natural salmon habitat, even though research and management experience document that such effects have, in fact, occurred. The predicted fish production is the same for the max timber benchmark; the benchmarks describe only the effects of full investment in salmon enhancement -- they do not show the very real damage to fish production that would occur if logging were allowed along salmon streams.

Salmon enhancement projects, according to FORPLAN as configured, more than make up for the assumed decline in salmon that would result under the max timber benchmark. In this case, we have a management schedule where the taxpayers are asked to invest in enhancement to compensate for the effects of logging.

The benchmark employment graph shows no variation in salmon fishery employment. If the computer says there will always be the same number of fish produced, and jobs are related to pounds of fish, employment would not change. What has happened is this: Tongass planners have set up their computer models so that they will calculate away the salmon-logging problem. This may work in the hypothetical realm of the computer, but it doesn't wash in real life.

Recreation and Tourism Analysis -- the Great Coverup

The AMS benchmarks suggest that recreation "capacity" will remain unchanged on the Tongass, no matter how the forest is managed. Forest Service officials explain that recreation supply so far exceeds demand that there is no problem with the effects of logging on recreation. This is a false and misleading presentation.

According to page 45 of the AMS, "most of the recreation use within the Forest occurs in favorite recreation places along the extensive shorelines, lakes and rivers. . . . Because recreation places tend to occur in areas associated with valleys, streams and beach fringes, they also tend to have high values for other resources including wildlife and timber. Tourism . . . is highly dependent on the diversity of scenery and wildlife provided by the National Forest. The challenge is . . . to ensure high quality recreation places, given competing timber values."

How can this logical explanation be reconciled with the table on page 59 suggesting that even the most extreme management benchmarks have no significant effects on recreation capacity? How can it be reconciled with the table on page 58 that predicts tourism employment will remain constant, no matter how the Tongass is managed? Does anyone really believe that the max timber benchmark, which schedules 780 million board feet of timber for cutting each year forever, would have no negative effect on tourism employment?
One likely answer is that the Forest Service FORPLAN model is replacing hunting, fishing, and hiking in the woods with campgrounds in clearcuts!

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Here's how it works. The Forest Service measures recreation is terms of "total recreation visitor days", or "RVDs." If FORPLAN counts up a lot of "RVDs" the computer is happy -- "no problem, boss."

Now think about it. In any given river valley, say ten people are hunting, some kayakers are camping, and two families are taking a hike. That's about 25 RVDs. Well, with its unlimited investment budget FORPLAN can build a campground in that valley that will hold 30 people -- 30 RVDs. At the same time, it can schedule the entire area for timber harvest, generating board feet. Well, the recreation capacity for hunting, hiking, and wilderness camping has dropped to zero, but the total number of RVDs available is higher!

That seems to be part of the benchmark recreation story: replace backcountry recreation with logging and campgrounds. This is a poor way to "ensure high quality recreation places, given competing timber values."

Another aspect of the recreation benchmark coverup was explained to me by Forest Service planners. The FORPLAN model schedules harvest in identified "recreation places" late in the 150 year planning schedule. By doing so the present net value is kept high and the resource opportunity costs are incurred in the distant future, when they can be reduced by discounting at 4%. In addition, the recreation visitor day values associated with the recreation places are assumed to drop when the place is logged, then increase as the second growth timber grows. As a result, the FORPLAN model displays the effects of logging on recreation only for certain windows in time; throughout the rest of the 150 year schedule the recreation sites are either uncut or filled in with second growth. By choosing to display recreation capacity at the ten year and 50 year marks only, the Forest Service avoided presentation of those windows in time when FORPLAN shows the impacts of logging. Was this deliberate? Probably. Regardless, the planners I talked to thought this was the main reason recreation effects did not show up. However, they did not rule out the "campgrounds in clearcuts" problem I explain above.

Recreation Demand Cutoff Adds to the Coverup

Whereas timber demand was never "cut off" by the planners (all timber supply was assumed sellable), recreation demand was limited by a cutoff point. This means that recreation opportunities above a certain supply level were accorded no value at all. Just why do Forest Service planners assume that all Tongass timber harvest is valuable "no matter what", but recreation is only valuable "up to a point?"

Forest Service's TLMP Revision Wildlife Analysis is in Shambles

On page 55 of the "user friendly" AMS the Forest Service presents a graph entitled "Wildlife Habitat Capability by Benchmark. As I explained earlier, the implication that all wildlife species' habitat requirements can be expressed by one number is biologically and logically absurd. Furthermore, there is serious disagreement among the planning team members as to how this graph was derived and what it represents. There is no documentation available to support any of the planners' accounts.

One planner says the graph shows only the total amount of commercial forest land that will remain uncut in each benchmark. The 24% "viable population" figure was based on his personal quasi-subjective estimate of what it would take to sustain a viable population of pine martens somewhere on the Tongass.

Another planner asserts that the Forest Service actually calculated the carrying capacity for each management indicator species (there are over a dozen!) for each forest "geozone" (analogous to, but different than, "management areas" in the first TLMP), then somehow added

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all of these calculations together to derive a Tongass wide wildlife index of some kind. There is no documentation of this procedure, which seems implausible at best.

On Friday, February 9, TLMP Revision leader Steve Brink said that he didn't know how the graph was derived, or exactly what it represented.

Based on my perusal of FORPLAN benchmark printouts, I believe the planning team did run the indicator species models, and the models showed that current and anticipated levels of Tongass logging will result in dramatic reductions in wildlife populations. I am presently studying these FORPLAN printouts in more detail and will pass along my conclusions soon.

Employment Figures Were Manipulated by the Forest Service in Order to Hide Impacts

We have seen how the Forest Service FORPLAN model disguised the effects of clearcut logging on salmon habitat capability and recreation capacity. The Forest Service then took these cooked figures and ran them through the agency's regional economic model, IPASS, to estimate the employment effects of the benchmark runs. Since the IPASS employment estimates are derived from deceptive FORPLAN output, and since that FORPLAN output understates the effects of logging on fish and recreation, the IPASS estimates merely reflect the limitations of the FORPLAN benchmarks.

In addition, the Forest Service employment figures cited in the table on page 59 of the "user friendly" AMS are only for the first ten years of the 150 year FORPLAN analysis schedule! Recall that the FORPLAN benchmark runs deferred timber harvest in recreation places to the distant future. And, salmon enhancement projects washed out declines in existing fish populations. In general, FORPLAN scheduled every clearcut with poor economics or with significant consequences to other resources in the distant future, subject only to the non-declining timber yield constraint.

Of course there are few employment effects in the first ten years. FORPLAN scheduled the activities that cause those effects in the future, and the Forest Service hid the employment consequences by reporting only the first decade figures. This appears to be a very deliberate attempt to mislead the public.

PART 3: CONCLUSION

Political Deadlines Undermine Resource Analysis

In my opinion, the upshot of the AMS benchmarks is this: Tongass planners have used unfinished configurations of the FORPLAN computer model to program away nearly all the trade-offs between timber and salmon, between timber and tourism, and between timber and recreation. Nonetheless, the benchmarks do suggest that the highest and best use of riparian timber is to leave it standing to protect salmon stream habitat. Overall, the benchmarks offer relatively little to policy makers who are struggling to come to terms with very real land allocation and management problems on the Tongass.

My best guess as to what happened is that agency planners were forced to publish unfinished work prematurely due to unrealistic deadlines. In a few cases, such as the reporting of employment effects, it seems the Forest Service deliberately misrepresented their own analysis. If political deadlines continue to take priority over sound resource analysis I expect to see more problems with TLMP Revision information in the future.

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Broken Promises -- the Tongass Land Management Plan Revision

Promises made for Revised Plan*	How Revised Plan is Actually Being Done
A realistic work plan will be established to guide development of the Revised Plan.	The approved work plan was essentially abandoned, there is no agreed-to process guiding revision.
Revised plan will be in compliance with federal laws: NFMA, NEPA, ANILCA. (page I-1)	Abandonment of original work plan casts doubt on whether these laws will be complied with.
Final revised plan will be implemented by 1990. (page V-2)	As of 2/26/90, the Forest Service is at least 2 years from completing the final plan, implementation could take until 1995-2000.
Revised plan will display a broad of range of alternatives. (page III-60)	Revised plan will have only four alternatives, one of which is the status quo.
Revised plan will provide an accurate timber type map database with reliable location-specific information, including standing volume, productivity class, and stand size class. (page III-11)	The timber type map database for the Revised Plan is so inaccurate that it can not be applied to any unit smaller than a "geozone." Geozones average 375,000 acres, meaning on-site impacts can not be assessed.
Revised plan will identify site-specific impacts of timber harvest and other actions on fish and wildlife habitat. (pages II-14 & II-18)	Site-specific impacts cannot be identified because of the inaccurate timber type map database -- the revised plan is now on a general, "programmatic" basis instead of a site-specific basis.
Revised plan will describe cumulative impacts. (page III-61)	Revised plan describes no cumulative impacts, instead these impacts won't be known until the final unit in the Tongass is logged.
Revised plan will address subsistence on a community-by-community basis in compliance with Title VIII of ANILCA. (page II-22)	Dropped as an issue.
Revised plan will provide a transportation analysis including location of roads and terminal transfer points with short-term, long-term, and cumulative effects. (page II-45)	Not to be included.
Revised plan will be developed using timely and appropriate public involvement. (page I-1)	The public is being forced to react to the revised plan, rather than help develop it. This approach creates controversy instead of solving problems.

* *From "Tongass Land Management Plan Revision Work Plan," U.S. Forest Service, July 1987*

What the 1987 Tongass Land Management Plan (TLMP) Revision Work Plan Said About Key Issues on the Tongass National Forest.

On Wildlife Habitat Management:

"We must be able to . . . predict where there may be conflicts between forest uses (e.g. high volume, high value timber stands coincide with important wildlife habitat and/or areas of high visual significance) [pps. III-27 - III-28]", and "wildlife habitat management . . . is linked to the larger issue of 'development versus preservation' of specific areas of the Forest and concerns about subsistence uses of forest resources. . . . Failure to address this issue will result in non-compliance with NFMA and possibly with NEPA [p. II-15, emphasis added]."

On Fish Habitat Management:

"Failure to address this issue will result in non-compliance with NFMA, ANILCA 507(a), and possibly with NEPA [p. II-19]."

On Subsistence Uses and Lifestyles:

"ANILCA requires that management activities on the Forest be evaluated to determine their short-term, long-term, and cumulative effects on subsistence use opportunities. Failure to address this broad issue could result in non-compliance with Title VIII of ANILCA and undesired changes in lifestyles within some Southeast Alaska communities [p. II-22]."

On Regional and Community Economic Development and Structure:

"Forest management programs not adequately coordinated with community needs . . . can result in increased resistance to Forest Service activities in the form of litigation and appeals. In addition, opportunities to provide for greater regional and community economic development and structure through the development of diversified economies may be foregone [p. II-25]."

On the Long-term/Short-term Timber Sales Programs:

"There is some concern that failure to address this issue may result in the disappearance of a viable short-term timber sales program on the Tongass. Failure to address this issue may also result in NFMA non-compliance and may complicate NEPA related analysis [p. II-36]."

On Transportation Systems and Road Management:

"If the issues associated with transportation planning are not addressed, there may be localized adverse impacts to anadromous fisheries, wildlife populations, visual quality, recreation and subsistence use opportunities, and community lifestyles [p. II-45]."

WORK PLAN

for Preparing the Environmental Impact Statement
and Revising the Land and Resource Management Plan
for the Tongass National Forest

Recommended:

K. W. ROBERTS, Forest Supervisor
Chatham Area

7/13/87
Date

Win Green
WIN GREEN, Forest Supervisor
Ketchikan Area

7/13/87
Date

R. E. Lynn
ROBERT E. LYNN, Forest Supervisor
Stikine Area

7/13/87
Date

Approved:

G. Lynn Sprague
MICHAEL A. BARTON
Regional Forester, Alaska Region

7/13/87
Date

official signatures
= A Commitment !

Tongass Land Management Plan Revision July 1987

Work Plan: Guidelines for Preparing the Environmental Impact Statement and Revising the Land and Resource Management Plan for the Tongass National Forest

Though not required, the Forest Plan IDT felt it necessary to identify tentative public issues, management concerns and resource development opportunities (refer to Section II. Issue Statements). As noted in the Issue Statements, this is not intended as a substitute for formal public involvement. Rather, the tentative Issue Statements were simply used by the Forest Plan IDT to help organize the approach to Work Plan development.

In this Work Plan, the Forest Plan IDT describes as complete a Forest Plan Revision process as is currently possible given the information of hand. The Work Plan is deliberately detailed since it assembles all relevant planning direction and information under one cover. The Forest Plan IDT fully expects there will be amendments to the Work Plan as the process unfolds and there is a better understanding of the needs associated with each task, and the form and detail of the revised Forest Plan become more evident. At this time, there are too many unsettled variables to accurately describe the budget requirements. The personnel to be involved in the various steps in the planning process have been described in a general manner, rather than explicitly. While the FSH 1909.12 directs the identification of both budget and personnel requirements, the experience drawn from NFMA planning efforts to date, indicates that explicit identification can only take place as the planning process develops and the Forest Plan IDT has had the opportunity to work closely with each of the Administrative Areas.

To facilitate the revision effort, the Forest Plan IDT recognizes there is need for NFMA training throughout the Tongass. It has not been decided whether such training will be offered, or if training is offered, when it take place/who will be involved. It is recognized there is a need to develop additional skills in the requisite quantitative analysis, computer modelling, and the planning regulations displayed in the NFMA implementing regulations. Such skills will also be of value during Forest Plan implementation.

The Forest Plan IDT makes wide use of acronyms throughout the Work Plan. In addition to defining each acronyms upon its initial use, a glossary is also provided to facilitate the reader (refer to Section IX. Glossary of Acronyms).

This Work Plan defines the process and tasks associated with revising the Forest Plan on the Tongass National Forest. When signed by all parties, the Work Plan represents an agreement between the Regional Forester and the three Tongass Forest Supervisors regarding the Forest Plan revision and serves as direction to the Forest Plan IDT. The following crosswalk is intended to facilitate a comparison of the Work Plan and FSH 1909.12.

Crosswalk Between Work Plan Direction and the Draft FSH 1909.12

Work Plan (page #)	Draft FSH 1909.12 (section #)	
	CHAPTER 3 - FOREST PLANNING PROCESS	
II-1-53	3.1	IDENTIFICATION OF PURPOSE AND NEED
Entire Section III	3.2	PREPARATION OF PLANNING CRITERIA
III-47-52	3.21	Minimum Management Requirements
III-1-26	3.3	INVENTORY DATA AND INFORMATION COLLECTION
III-44-45	3.31	Capability, Analysis, and Management Areas
III-1-26 and 32-43	3.32	Data and FORPLAN Coefficients
III-44-46 & Appendix A	3.33	Analytical Tools

g) At least one alternative should reflect a continuation of current management direction and resource output levels (the "no action" alternative).

h) Each alternative shall represent the most cost efficient management prescriptions that can meet the objectives of that alternative.

i) As a minimum, each alternative must display the condition and uses resulting from the long-term implementation of that management direction, the timing and flow of the resulting goods and services, the associated costs and benefits, the resource management standards and guidelines, and the overall purpose of that alternative.

The Forest Plan IDT, in assuring that the NFMA requirements for alternative formulation are met, must pay particular attention to the experience gained from previous plans. Current planning efforts have resulted in numerous appeals and have involved considerable time and effort. One of the major problems identified through the appeal process has been the lack of a sufficient range of alternatives. The tendency has been to limit the range of alternatives to those most acceptable to a 'prudent' forest manager. From an internal Forest Service perspective this may appear to be a rational and efficient approach to the planning process. However, this can result in a failure to consider and document a full range of reasonable alternatives, and thus a failure to meet the intent of NEPA. Another common point of criticism has been inadequate EIS displays, or an inadequate evaluation of the cumulative effects and the flow of goods and services associated with an alternative. Such displays are critical to the evaluation of the alternatives in that they ensure that the long-term consequences of an alternative are considered in the planning process.

3. Documenting Alternative Formulation

The Forest Plan IDT will need to formulate a broad range of reasonable alternatives that address major public issues, management concerns, and resource use and development opportunities. (Refer to FSM 1922.13 for the minimum requirements for formulating alternatives.) For each alternative analyzed, the Forest Plan IDT will need to document the:

a) overall management approach and resource emphasis;

b) management goals and objectives and how they relate and respond to identified issues, concerns, and opportunities;

c) standards and guidelines necessary to achieve the alternative;

d) relationship of the alternative to benchmarks and how it falls within the range of management opportunities defined by the benchmarks;

e) FORPLAN constraints imposed, the rationale for these constraints, the constraint analysis (that is, an assessment of the costs of the constraint), and an evaluation indicating that the constraints were the most cost effective means to achieve the objectives of each alternative;

f) forest plan alternatives considered but eliminated from detailed study and the rationale for this elimination; and

g) forest plan alternatives considered in detail.

The CHAIRMAN. Thank you very much, Mr. Metcalf.

Next we will hear from Don Finney, who is the General Manager of the Alaskan Loggers Association.

STATEMENT OF DON FINNEY, GENERAL MANAGER, ALASKA LOGGERS ASSOCIATION

Mr. FINNEY. Thank you, Mr. Chairman.

Mr. Chairman, my name is Don Finney.

The CHAIRMAN. If you could pull the microphone up, please.

Mr. FINNEY. I have been a professional forester in Alaska for over 40 years. I am the General Manager of the Alaska Loggers Association. The Alaska Loggers Association is made up of 115 regular members and 180 associate members. Its direct members employ over 4500 persons in their total timber operations in Alaska. 3500 of these are on the Tongass National Forest.

This number is indicated in the McDowell report that we just received Friday p.m. and that shows the Tongass employment information and wages. We will turn that in for the record today, sir.

The Tongass discussions have now broken into two parts: the Tongass reform issue, which launched the debate in 1986; and the land issue about buffer strips, which first emerged as an issue in 1989. Today's hearings, as I understand it, is to deal solely with the latter of these two issues.

The TLMP process. The problems with the completion of the legislation at this point have to do with the buffer strip and land allocation issues. We in the timber industry now ask the same question posed by the environmental community concerning the $40 million automatic appropriation and the 4.5 billion board-feet per decade allowable sale quantity guarantee:

Why should not the Tongass be treated like every other forest? Why should not the National Forest Management Act planning process be employed on the Tongass? $7 million has been spent by the Forest Service to date on the TLMP revision process and it is quite close to producing draft land alternatives.

The TLMP revision process has now started. The draft EIS with land use alternatives will be out in June. However, the first step in the process, the benchmarks for the analysis of the management situation, has come out.

Its preliminary findings show that under the current plan the Tongass could maintain an allowable sale quantity of 450 million board-feet per year for the next ten years. This would leave 15.7 million acres of roadless land, including designated wilderness, at the end of the next planning cycle; a capability of producing 130 million pounds of fish per year for the next 50 years; 7.5 million acres of old growth remaining after 50 years; and 4,200,000 visitor recreation days a year.

And the Tongass would maintain a $2.7 billion present net value excluding minerals. This is shown on page 52 of the Forest Service analysis of the management situation, which I am sure you have received a copy of.

Further, several options appear to exist to increase the allowable sale quantity. While maintaining fish capability and recreation visitor days, these options could increase employment and present net value with only a 200,000 acre or one and a half percent reduction in roadless land, including designated wilderness.

In short, the benchmarks show that multiple use under TLMP as it was approved in 1979 is working well. The ALA urges the Congress to treat the Tongass like every other national forest in the country and allow the TLMP revision process to make any changes needed in the existing management program.

The Forest Service has spent $7 million on the TLMP revision process to date. The Forest Service has used the same planning process used on every other national forest in the country.

The Forest Service has received input from every community in southeast Alaska over the last three years. Any land designation or change in management regime which preempts the process now established in law for land designations will not have the same factual, scientific, and public backing as that which will come from the Tongass land management plan revision.

Why not use its alternative land plans as the basis for Congressional action?

It is no secret that H.R. 987 sets out 23 land areas that were originally requested by the Southeast Alaska Conservation Council. There was no process used to select those areas. They were just areas that SEACC wanted.

There was no debate, either, in the House Interior Committee or on the floor of the House regarding whether those were good boundaries or bad boundaries.

In the absence of Forest Service information, Congress has no way of knowing what was good public policy and what was not. Why should any special interest group's wish list be substituted for the process you have told the Forest Service to follow under existing law?

The Southeast Conference approach is certainly better than SEACC's. Yet, it too should not be substituted for the TLMP revisions.

We in the ALA take our hard hats off to the Southeast Conference because at least they recognize this point, and they have written to you that they would prefer for the TLMP process to go forward.

However, they are saying that if Congress preempts the TLMP revision process that, rather than enacting the SEACC wish list, Congress should use the lands the Southeast Conference is proposing.

Unlike SEACC, which is interested in setting aside vast wilderness areas, the Southeast Conference is interested in setting aside specific areas of special interest to local communities.

The Southeast Conference has emphasized over and again that it does not want wilderness areas, but instead suggests that, if Congress is going to preempt the TLMP process, it should consider special no-timber harvest designation only in certain specified areas.

These would be areas of no timber harvest. These areas would be areas near communities which community residents could use for things such as recreation.

The ALA is adamantly opposed to the SEACC proposals incorporated in H.R. 987. H.R. 987 would add 23 new wilderness areas containing 1.8 million acres of designated wilderness. This is in addition to the 5.4 million acres of wilderness designated by ANILCA in 1980.

It would reduce the allowable sale quantity by more than 75 million feet and interrupt four operations currently under contract. It would also preclude planned timber operations in three additional areas, and it would destroy the productive balance of two pulp mills and five saw mills in the forest.

The impacts of this additional wilderness cannot be justified by any type of rational land planning. That is why the environment community is attempting to get Congress to legislate it in advance of the TLMP revision process.

I would like to show you just a little bit of what the impact would be on a map displayed here on the board. I will try to speak loudly so I can do it from here. This map shows the existing wilderness areas in blue, and it shows the LUD-II or no-harvest areas in orange.

The black areas that are described on the map are the 23 areas proposed in the House legislation. One of the things I'd like to point out that happened in the original Tongass, TLMP or Tongass process, the ANILCA process in the original designations of wildernesses, is that this is a large, 2.2 million acre Mysty Fjord wilderness area, and it shut off any possibility of an access route into the lower part of southeast Alaska by closing the access to the Unitka River in this area.

The Stikine area also closed off any access to the Wrangell or Petersburg area for development, because it made the Stikine River into a wilderness area.

Very few of the larger areas in southeast Alaska have the ability to have a continuous road operation. A good example of one that does not is Ketchikan. Ketchikan has 17 miles of road one direction, 20-some miles of road the other direction; not apt to have a lot more road out of there developed by timber because the timber is not contiguous to that area.

Northern Prince of Wales Island is one of the areas that is contiguous and has a huge road development on it now. It has 700 miles of drivable road developed on that island. There is only two other areas in southeast Alaska that have that potential. One is QU Island and the other is the north end of the Chichagof Island.

Those are very skillfully being put into these new wilderness areas so that that access can be closed off. As you can see here, in the QU Island area there is a wilderness existing here. This would cut off any access to the other areas, as will this and this, so that you cannot develop this contiguous road system.

It is going to make logging more difficult in those areas. So that the proposal that is there not only shuts off the logging that is actually in those areas, but it closes off the ability to do a lot of the additional logging that could be done economically in the area.

This one you can see tied this into this wilderness area [indicating]. It closes off any road access into this area to get a contiguous road system. This is of course the Admiralty Island wilderness.

This piece of wilderness shuts off any access going south into the interior part of the country because it is close to the Taku River.

The Berners Bay wilderness that is being proposed north of Juneau will cut off any opportunity for road access from Juneau into Skagway or Haines and do away with that.

These areas are being very skillfully chosen to really maximize the ability to have any additional development in the area.

The second issue for today's hearing concerns Congressionally mandated buffer strips. H.R. 987 requires buffer strips on all Class I, II, and III streams. The Forest Service has determined that this would reduce the allowable sale quantity for the Tongass by approximately 21 or 22 percent.

This is displayed in my written testimony in one of the exhibits.

Alternatively, the Forest Service will be forced to enter roadless areas at a more rapid rate to sustain the industry. It is important to spend just a moment looking at what the Forest Service is required to do and what the National Marine Fisheries proposes, and if you will refer to pages 8 and 9 of my written testimony.

I cite the Forestry Management Act as the requirements presently followed by the Forest Service. The aquatic habitat management units handbook was developed by the Forest Service inter-disciplinary team to give resource professionals site-specific directions for protection of fish habitat. Special consideration is given to the area at least 100 feet on either side of the streams.

The Forest Service implements these laws, regulations, policies, site-specifically in order to best manage habitat to meet the fisheries goals. Following on the ground investigations and analyses, inter-disciplinary teams select streamside prescriptions that will best protect the fish habitat at that site.

Many site-specific factors, such as stream channel, bank condition, water temperatures, fish passage, and so forth, are included in these considerations, along with inter-disciplinary teams that measure widths and make these determinations.

The National Marine Fisheries Service policy is based on the desirability of recruiting large wooden debris into a stream for the spawning and rearing purposes. It is clear that 99 percent of the large organic debris originates from the area within 100 feet of a stream. This is the reason for the 100-foot buffer strip.

However, as National Marine Fisheries Service's own research points out, most of the large woody debris falls from areas much closer to the streams. For example, trees fall in as streams undercut the banks and wind-blown and so forth. The National Marine Fisheries research notes that 97 to 98 percent of the large woody debris originates within 82 feet of the stream, and 89 percent from within 50 feet of the stream, and 82 percent from within 32 feet of the stream.

Indeed, nearly 50 percent of the large woody debris came from the stream bank areas less than three feet from the stream and two-thirds from within 15 feet. In other words, the National Marine Fisheries Service policy focuses solely on the large woody debris aspect of the riparian management, to the exclusion of equally important biological considerations which even the National Marine Service acknowledges.

Congressional direction in Section 6[g][I][E] of the National Forest Management Act explicitly requires the Forest Service to manage in consideration of additional criteria. Because the National Marine Fisheries Service large woody debris policy deals with only one aspect of streamside management, it is impossible to see how fisheries are in any way injured by the Forest Service's adoption of a more comprehensive policy for fisheries protection, as described by the regional forester.

Mandating buffer strips by law will make the Tongass different than any other national forest, will usurp the Tongass land management planning process, and will take away the opportunity to manage the resource on a site-specific basis.

Congress should address what the objectives of management are, but leave it to the professional managers to how this is best accomplished.

Thank you.

[The prepared statement of Mr. Finney follows:]

STATEMENT OF DON FINNEY
ALASKA LOGGERS ASSOCIATION
BEFORE THE
SENATE ENERGY AND NATURAL RESOURCES COMMITTEE
FEBRUARY 26, 1990

INTRODUCTION

Mr. Chairman, my name is Don Finney. I have been a professional forester in Alaska for 40 years. I am the general manager of the Alaska Loggers Association (ALA). With me today are Dr. Doug Martin, a fisheries expert, to answer questions about riparian management, and Owen Graham, Chairman of the ALA's Map Committee, to answer technical questions about maps. The ALA is made up of 115 members and 180 associate members. Its direct members employ over 4,000 persons in timber operations. It is an honor to be here this morning to present testimony to you and other members of the Committee regarding the proposed National Marine Fisheries Service (NMFS) buffer strip proposal and various land proposals as they would impact the Tongass bills before the Committee.

The discussions have now broken into two parts: the "Tongass Reform" issues, which were used to launch the debate in 1986; and the land issue (including the concern about buffer strips which first emerged as an issue in 1989). Today's hearing, as I understand it, is to deal solely with the latter of these two issues.

UTILIZE THE TLMP PROCESS:

The problems with the completion of the legislation at this point have to do with the buffer strip and land allocation issues. We in the timber industry now ask the same question posed by the environmental community concerning the $40 million automatic appropriation and the 4.5 billion board feet per decade ASQ guarantee: "Why shouldn't the Tongass be treated like every other forest?" Why shouldn't the National Forest Management Act land planning process be employed on the Tongass? Five million has been spent by the Forest Service to date on the TLMP revision process and it is quite close to producing draft land alternatives?

In 1976, Congress enacted the National Forest Management Act (NFMA). This landmark legislation established a long term planning process to be implemented by the U.S. Forest Service in a manner consistent with these principles. NFMA required a forest plan to be developed for each national forest by September 1985. Each plan was to be revised every ten years, again subject to active public participation.

The Forest Service implemented the Tongass Land Management Plan (TLMP) in 1979, pursuant to the NFMA, the first such forest plan in the nation. Congress carefully reviewed TLMP when it passed Section 705 in 1980. As part of TLMP, the Forest Service assigned a high priority to the protection of fish and wildlife resources. Over 40% of the Tongass was designated as high priority wildlife habitat areas. Almost 70% of the identified deer winter habitat will remain unharvested in the year 2079. The TLMP revision process provides sufficient flexibility should the agency determine that greater protection of deer winter habitat is necessary.

The Forest Service is also enhancing the Tongass' fishery resources. Over one million acres of land with watershed systems having important commercial, recreational, and subsistence fisheries values have already been set aside as wilderness or unroaded areas. The Forest Service is currently engaged in cooperative efforts with the Alaska Department of Fish and Game (ADF&G) and several non-profit aquaculture associations to enhance the salmon resources.

The timber industry has donated equipment and manpower for fisheries enhancement projects. In 1989, "the Dog Salmon" fish pass on Prince of Wales Island and the "Marguerite Creek" fish pass on Revilla Island were constructed with assistance from local logging contractors.

The Forest Service closely monitors water quality and quantity, including the potential positive and negative impacts of road construction and timber harvest on salmon spawning habitat.

The fishing industry accounts for over 3,000 jobs in Southeast Alaska, and is booming. Since 1980, there has been an annual average harvest of 130 million pounds of fish, with an annual vessel value of $86 million. In the 1950's, the annual salmon catch in Southern Southeastern averaged 9.8 million fish per year (see attached chart). In 1984, the Southeast total was more than 62 million fish. Historical recorded commercial fish catches in southern Southeast Alaska dating back to the early 1900's averaged about 20,000,000 fish per year. By reason of overfishing, the catch had diminished to about 8,000,000 fish per year by 1953 and remained low through the 1950's and 1960's when the timber industry was in its infancy, but by the mid-1970's, an increase in fish catches began that is continuing today. From 1977 through 1982, the catches averaged about 15,000,000 fish per year. Since 1983, the catches have averaged over 30,000,000 fish per year, which is much higher than the historical averages, with two all time records set in the last four years (see attached chart).

Recent improvement in the deer population has permitted an increase in the length of season and an increase in the bag limit to six deer per season. Numbers of bald eagles have increased dramatically and excess eagles have been relocated to New York and other states.

The tourism and recreation industry is also doing well. Over 300,000 people visit Southeast Alaska every year. Approximately 80% of this is via tour ship which travels the water route of the inside passage and stops at various communities along the way. A portion of it represents independent travelers who either enjoy the area through kayacking and remote fly-ins, or by using camping vehicles on Prince of Wales Island where they enjoy the roaded recreation areas developed by the Forest Service through timber sales. The compatibility between the timber and tourism industries is seen in the attached November 28, 1989 Resolution of the Alaska Visitors' Association. (Exhibit A)

The TLMP Revision Process is now started. The Draft EIS with land use alternatives will be out in June. However, the first step in the process the Benchmarks for the Analysis of the

Management Situation has come out. Its preliminary findings show that under the current plan, the Tongass could maintain an allowable sale quantity of 450 million board feet per year for the next ten years. This would leave 15.7 million acres of roadless land, (including designated wilderness) at the end of the next planning cycle; a capability of providing 130 million pounds of fish per year for the next 50 years; 7.5 million acres of old growth remaining after 50 years; 4,200,000 visitor recreation days a year; and the Tongass would maintain a $2.7 billion present net value, excluding minerals. (See page 52 of the Forest Service Analysis of the Management situation.) Further, several options appear to exist to increase the allowable sale quantity, while maintaining fish capability and recreation visitor days. These options would increase employment and present net value with only a 200,000 acre or one and a half percent reduction in roadless land (including designated wilderness). In short, the Benchmarks shows that multiple use under TLMP as it was approved in 1979 is working well.

The ALA urges the Congress to treat the Tongass like every other National Forest in the country and allow the TLMP revision process to make any changes needed in the existing management program. The Forest Service has spent $5 million on the TLMP Revision Process to date. The Forest Service has used the same planning process used on every other national forest in the country. The Forest Service has received input from every community in Southeast Alaska over the last three years. Any land designation or change in management regime which preempts the process now established in law for land designations will not have the same factual, scientific and public backing as that which will come from the Tongass Land Management Plan revision. Why not use its alternative land plans as the basis for congressional action?

It is no secret that HR 987 sets out 23 land areas that were originally requested by the Southeast Alaska Conservation Council (SEACC). There was no process used to select those areas -- they were just areas that the SEACC wanted. There was no debate either in the House Interior Committee or on the floor of the House regarding whether those were good boundaries or bad boundaries. In the absence of Forest Service information, Congress has no way of knowing what was good public policy and what was not. Why should any special interest group's "wish list" be substituted for the process you have told the Forest Service to follow under existing law?

The Southeast Conference approach is certainly better than SEACC's, yet it, too, should not be substituted for the TLMP revisions. We in the ALA take our hard hats off to the Southeast Conference, because at least they recognize this point. As they have written to you, they would prefer for the TLMP process to go forward. However, they are saying that if Congress preempts the TLMP revision process, that rather than enacting the SEACC "wish list", Congress should use the lands the Southeast Conference is proposing. Unlike SEACC, which is interested in setting aside vast wilderness areas, the Southeast Conference is interested in setting aside specific areas of special importance to local communities. The Southeast Conference has emphasized over and again that it does not want wilderness areas, but instead suggests that if Congress is going to preempt the TLMP process it should consider special "no timber harvest" designation only in certain specified areas. These areas would be areas of no timber harvest. These areas would be areas near communities which community residents could use for such things as recreation.

The ALA is adamantly opposed to the SEACC proposal as incorporated in HR 987. HR 987 would add 23 new wilderness areas containing 1.8 million acres more of designated wilderness. This is in addition to the 5.4 million acres of wilderness designated by ANILCA in 1980. It would reduce the allowable sale quantity by more than 75 million board feet and interrupt four operations currently under contract. It would preclude planned timber operations in three additional areas. The impacts of this additional wilderness cannot be justified by any type of rational land planning. This is why the environmental community is attempting to get Congress to legislate it in advance of the TLMP revision process.

I would now like to show you the problems with the 23 areas SEACC has proposed: [show maps]

The second issue for today's hearing concerns Congressionally mandated buffer strips. HR 987 requires buffer strips on all Class I, II and III streams. The Forest Service has determined that this would reduce the allowable sale quantity for the Tongass by approximately 21% or 22%. (See Exhibit B) Alternatively, the Forest Service will be forced to enter roadless areas at a more rapid rate to sustain the industry.

CONGRESSIONALLY MANDATED BUFFER STRIPS ARE NOT NEEDED AND WOULD DRASTICALLY AFFECT THE ECONOMY OF SOUTHEAST ALASKA. Even the National Marine Fisheries Service NMFS), which is the author of the buffer strip proposal recognizes that site specific management is best. For example, in Chapter Four of a workshop compendium "Streamside Management: Forestry and Fisheries Interactions" (Selo and Cundy, ed. 1987), Mr. Koski and five others point out the following regarding streamside management:

> "They finally recommend that 'if managers desire to manage an optimum mix of forest resources consistently, a staff of trained specialists is needed. Rather than relying on guidelines that have little flexibility from site to site, managers need to rely on the knowledge of foresters, engineers, hydrologists, wildlife and fishery biologist and other disciplines as needed to tailor forest management operations to the constantly changing characteristics of the landscape and streamside areas.'"

The problem is that the NMFS does not trust the Forest Service. Thus, management by tape measure is preferable to the site specific management Congress has required through the NFMA on every other national forest.

It is instructive to spend just a moment looking at what the Forest Service is required to do and what the NMFS proposes. NFMA requires the Forest Service to protect fish habitat on all National forests. Section 6(g)(1)(E) of NFMA requires the agency to:

> Insure that timber will be harvested from National Forest system lands only where protection is provided for

> streams, wetlands, and other bodies of water from detrimental changes in water temperatures, blockages of water courses, and deposits of sediment, where harvests are likely to seriously and adversely affect water conditions or fish habitat.

The applicable federal regulation, 36 C.F.R. 219.27, states:

> Special attention shall be given to land and vegetation for approximately 100 feet from the edges of all perennial streams. No management practices causing detrimental changes in the water temperature or chemical composition, blockage of water course, or deposits of sediment shall be permitted.

The Forest Service National Riparian Policy orders the Forest Service to:

> Manage riparian areas under the principles of multiple-use and sustained-yield, while emphasizing protection and improvement of soil, water, vegetation, and fish and wildlife resources; give preferential consideration to riparian-dependent resources when conflicts among land use activities occur.

In 1983 an Alaska Regional Guide was developed which established AHMU to cover all fish habitat components. The guide states:

> Within AHMU's timber harvest and other land-use activities are prescribed to meet management goals for fish habitat.

An AHMU Handbook was developed by an interdisciplinary team to give resource professionals site-specific direction for protection of fish habitat. Special consideration is given to the area at least 100 feet on either side of streams.

The Forest Service implements these laws, regulations, policies site-specifically in order to best manage habitat to meet fisheries goals. Following on-the-ground investigations and analyses, interdisciplinary teams select streamside prescriptions that will best protect fish habitat at that site. Many site-specific factors, such as stream channel and bank condition, water temperature, soils, fish passage (access), water quality, large woody debris, timing of bridge and culvert installation, AHMU class and stream gradients must be considered. Interdisciplinary teams prescribe protection measures, including the width of the area in which no trees are cut. This width may be more or less than 100 feet, depending on stream class, channel type and site-specific conditions.

The above Forest Service policies are described in "Fish Habitat Management on the Tongass National Forest," attached as Exhibit C. At page 13, Exhibit C demonstrates that the Forest Service includes the NMFS LOD rationale in making timber harvesting and road construction decisions:

> Many research studies have been, and are being, conducted in Southeast Alaska on habitat requirements of anadromous and resident fish, effects of land-use activities on fish habitat, and fish habitat enhancement opportunities. Results are incorporated into Forest Service policies and prescriptions. Research has pointed out the substantial variability in conditions, and the opportunities and need for similarly variable prescriptions. An example is large woody debris. Previously, biologists and others believed all logging debris had to be removed from streams to protect fish habitat. Forest Service policy reflected that belief. Through research, it was determined that some large woody debris in streams is needed to protect fish and to increase salmon and trout production. Current policy and management practice provides for enough debris for fish habitat and retention of standing trees nearby for future replacement.
>
> Research has identified other ways to protect and enhance fish habitat. In some locations, increased light reaching the stream is needed to increase fish production, further pointing out the need for individual prescriptions based on local conditions and characteristics.

As the responsible agency, the Forest Service has the obligation to manage riparian zones for criteria in addition to LOD, which the Forest Service did in this case.

The NMFS policy is based on the desirability of recruiting large organic debris (LOD) into a stream for spawning and rearing purposes. It is clear that 99 percent of the large organic debris originates from the area within 100 feet of a stream - this is the reason for the 100-foot buffer strip. However, as NMFS's own research points out, most of the LOD falls from areas much closer to the streams; for example, trees fall in as streams under cut stream banks. The NMFS research notes that 97-98 percent of the LOD originates from within 82 feet (25m) of the stream, 89 percent from within about 50 feet (15m), and 82 percent from within 33 feet of the stream (Murphy, et al., 1987). Indeed, nearly 50 percent of the large woody debris came from stream bank areas less than one meter from the stream and two-thirds from within 5 meters.

In other words, the NMFS policy focuses solely on the LWD aspect of riparian management to the exclusion of equally important biological considerations, which even NMFS acknowledges. Congressional direction in Section 6(g)(1)(E) of NFMA explicitly requires the Forest Service to manage in consideration of additional criteria. Because the NMFS LOD policy deals with only one aspect of streamside management, it is impossible to see how fisheries are in any way injured by the Forest Service adoption of the more comprehensive policy for fisheries protection as described by the

Regional Forester in the Record of Decision as quoted above. Since the NMFS policy is included as part of the AHMU program and only modified after a consideration of long-term LOD supplies as well as other important factors affecting fish production, the assertion that anything less than 100-foot buffers in every instance will create harm is ludicrous.

In many instances, good riparian management actually requires action in the riparian zone. For example, many streams in Southeast Alaska are too cool for optimum fish production. These specific streams would benefit from selective removal of shade trees. Secondly, many of the streams in Southeast Alaska are lacking in nutrient and fine gravel material is needed by some fish species. These streams would benefit from a modest amount of sediment being introduced into the streams. Third, many streams in Southeast are blocked by blown down timber. This damage could be reduced by having such potential problem trees removed from the riparian zone during harvesting. Fourth, increased solar radiation from selective tree removal could increase nutrient growth, thus enhancing the overall productivity of the stream.

If mandatory buffer zones are Congressionally mandated, even if mandated only for Class I streams, then at least the following management regimes should be allowed within the zone:

1. Road crossing should be allowed within buffer strips where necessary for accessing other areas for purposes of National Forest management. This may include, but not be limited to, considerations for

accessing portions of harvest units as well as accessing other land areas. Such roads should be designed to have minimal effect on fisheries habitat contained within the buffer and crossings should be designed to cross perpendicularly within the buffer, insomuch as practicable considering engineering limitations and design necessary to protect fisheries.

2. Yarding corridors not to exceed 25 feet in width, should be permitted to cross buffer strips in those limited instances where it is possible to eliminate a road crossing of a stream by fully suspending logs over the stream and adjacent banks during yarding, but where it is infeasible to suspend above the existing trees within the buffer. Trees within the yarding corridor should be directionally felled to eliminate impacts to the streams from felling and yarding. These yarding corridors should occur at an average frequency not to exceed 1 corridor per 200 feet of stream. The location of such corridors should be developed through an interdisciplinary process, with principal consideration given to fish habitat.

3. To facilitate yarding operations, and particularly to obtain needed "lift" to get full or partial suspension, rigging should be allowed to be placed

in trees within the buffer zone. Suspension of logs is critical to reducing or eliminating the impacts to soils and water quality from yarding.

4. For purposes of enhancing fisheries production, removal of timber from within buffer strips should be allowed on those occasions where it is of benefit to the fisheries resource. This activity should occur only after full interdisciplinary review, and consultation with the Alaska Dept. of Fish and Game.

Mandating buffer strips by law will make the Tongass different that other National Forest, usurp the Tongass Land Management Planning process and will take away the opportunity to manage the resources on a site specific basis. Congress should address what the objectives of management are, but leave it to the professional managers as to how this is best accomplished. Dr. Martin will be glad to answer any questions on this subject.

In conclusion, we urge you to treat the Tongass like other National forests.

01/09/90 11:44 FAX 907 747 2268 ALASKA PLP WOODS --→ CLARK JUNEAU 002

AVA

ALASKA VISITORS ASSOCIATION
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1989-90
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A RESOLUTION OF THE ALASKA VISITORS ASSOCIATION REGARDING:

TONGASS NATIONAL FOREST

WHEREAS, Alaska's economy is supported by a multitude of industrial activities including petroleum, mining, fishing, timber and tourism, and

WHEREAS, the Alaska Visitors Association recognizes the interrelationship between these diverse industries for the overall health of the state as well as the visitor industry, and

WHEREAS, the Alaska visitor industry is dependent upon communities, attractions and facilities that have developed around the diverse Alaska economy, and

WHEREAS, pending legislation in the United States Congress relating to the Tongass National Forest could have severe impacts upon the timber industry and communities within Alaska, and

WHEREAS, legislation could result in limitation of visitor access to many scenic areas of the Tongass National Forest through designation of additional wilderness, and

WHEREAS, these impacts could result in reduced level of facilities and services available to the Alaska visitor.

NOW THEREFORE BE IT RESOLVED, that the Alaska Visitors Association opposes HR-987 and SB-346 and encourages passage of SB-237, introduced by our congressional delegation, which protects the commercial and recreational values of the Tongass and the economic well being of the associated communities.

AND BE IT FURTHER RESOLVED, that the Alaska Visitors Association encourages protection of scenic and wilderness values within the Tongass National Forest through the Tongass Land Management Plan Process, rather than by additional congressional designation of wilderness.

ADOPTED by the Board on November 28, 1989

EXHIBIT A

SEP 14 [illegible]

United States Department of Agriculture
Forest Service
Washington Office
12th & Independence SW
P.O. Box 96090
Washington, DC 20090-6090

ESTIMATE OF ACRES AFFECTED WITH 100 FOOT RIPARIAN BUFFERS

Estimate of the number of acres associated with an amendment for HR 987 (Mrazek) by Miller to require a minimum of a 100 foot buffers on each side of all fish streams and their tributaries.

Existing direction to protect riparian habitat and water quality represents about 3% to 5% of productive forest available for harvest being reserved as buffers. The current Geographic Information System (GIS) inventory indicates that 6% to 9% of the productive forest would be in the buffer of primary stre channels. It is estimated that 20% to 25% of the productive forest land is i buffers of tributaries not in GIS.

ANALYSIS SUMMARY

	ACRES	
GIS INVENTORY		
TOTAL LAND AREA	555,545	
100' BUFFERED LAND AREA	28,759	
PERCENT LAND AREA IN BUFFER		5%
TOTAL PRODUCTIVE FOREST LAND		
RECENT HARVEST AREAS	34,176	
LOW VOLUME SAWLOG ACRES	83,321	
MEDIUM VOLUME SAWLOG ACRES	118,552	
HIGH VOLUME SAWLOG ACRES	39,909	
TOTAL	275,958	
PRODUCTIVE FOREST LAND IN RIPARIAN BUFFER		
RECENT HARVEST AREAS	1,603	
LOW VOLUME SAWLOG ACRES	5,004	
MEDIUM VOLUME SAWLOG ACRES	9,495	
HIGH VOLUME SAWLOG ACRES	3,305	
TOTAL	19,407	
PERCENT PRODUCTIVE FOREST LAND IN GIS BUFFER		7%
ESTIMATE OF TRIBUTARIES NOT IDENTIFIED IN GIS		
TOTAL FOREST LAND SAMPLED	3,441	
TOTAL FOREST LAND IN RIPARIAN BUFFER	756	
PERCENT PRODUCTIVE FOREST LAND IN 100 FOOT BUFFER NOT IDENTIFED IN GIS		22%
(THIS IS A MEAN AVERAGE - THE RANGE OF TRIBUTARIES NOT ON THE GIS FOR INDIVIDUAL HARVEST UNITS WAS FROM 0-80%)		
TOTAL ESTIMATE		29%

EXHIBIT B

United States
Department of
Agriculture

Forest Service

Alaska Region R10 MB 83
October 1989

Fish Habitat Management on the Tongass National Forest

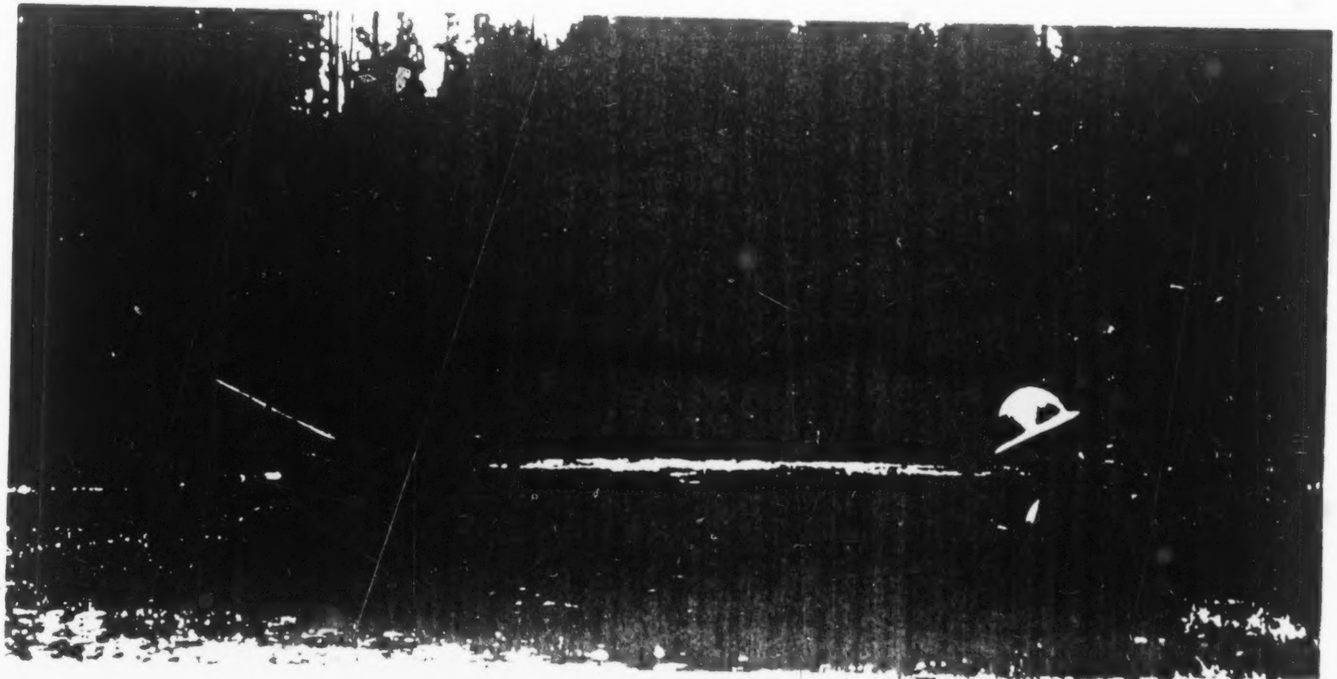

EXHIBIT C

Fish Habitat: A Major Tongass National Forest Program

Fish habitat on the Tongass is important. One-fourth of the Alaska commercial salmon harvest comes from Tongass streams. The 1989 statewide catch exceeded 690 million pounds, a new record. At its peak, the fishing industry, dependent upon fish from Tongass National Forest habitat, provides over 4600 jobs and earnings of $100 million.

Since 1980, the Forest Service has spent over $14 million improving fish habitat. The result is a potential annual increase of 8 million pounds of anadromous fish. The Alaska Department of Fish and Game, Aquaculture Associations, Trout Unlimited, Louisiana Pacific, and many others cooperated. Cooperators contributed approximately $700,000 in 1989.

Fish Habitat Protection Required by Federal Law

The National Forest Management Act of 1976 requires the Forest Service to protect fish habitat on the National Forests: "Insure that timber will be harvested from National Forest system lands only where protection is provided for streams, wetlands, and other bodies of water from detrimental changes in water temperatures, blockages of water courses, and deposits of sediment, where harvests are likely to seriously and adversely affect water conditions or fish habitat." Regulations further direct that: "Special attention shall be given to land and vegetation for approximately 100 feet from the edges of all perennial streams. No management practices causing detrimental changes in the water temperature or chemical composition, blockage of water courses, or deposits of sediment shall be permitted."

Current Forest Service Policies Protect Fish Habitat

The Forest Service National Riparian Policy states: "Manage riparian areas under the principles of multiple-use and sustained-yield, while emphasizing protection and improvement of soil, water, vegetation, and fish and wildlife resources . . .." The Alaska Regional Guide, developed in 1983, established Fish Habitat Management Units within which: ". . . timber harvest and other land-use activities are prescribed to meet management goals for fish habitat."

An Aquatic Habitat Management Handbook to implement the Guide was subsequently developed by an interdisciplinary team which included Forest Service, State Department of Fish and Game, U.S. Fish and Wildlife Service, and National Marine Fisheries Service representatives.

Under Aquatic Habitat Unit Handbook direction, Tongass National Forest streams are classified and cataloged according to their importance to fish:

1. Class I: Streams with anadromous fish habitat or a high value resident sport fishery. (Anadromous fish spend part of their life cycle in fresh water and part in salt water.)

2. Class II: Streams with resident fish populations.

3. Class III: Streams with no fish present but with potential water quality influence on downstream fish habitat.

Different fish habitat management and water quality protection measures used within each class are dependent upon individual conditions.

Habitat Protection on the Ground

The Forest Service implements these habitat management laws, regulations, and policies site-specifically to meet fisheries goals. Following field investigations, streamside management prescriptions are designed to best protect or enhance fish habitat at specific sites. Many site-specific factors, such as stream channel and bank characteristics and conditions; water temperature, soils, fish passage capability; water quality; large woody debris; timing for bridge and culvert installation; and stream class are evaluated.

Prescriptions specify width of area within which no commercial logging is permitted. On anadromous fish streams, this width may vary from 25 to more than 200 feet depending upon evaluation of all factors.

Site-Specific Approach

The Forest Service, as well as other Federal and State agencies, have similar fish habitat goals. The Forest Service approach is to custom design protection and management measures specific to each stream site using inter-disciplinary teams consisting of: fish and wildlife biologists, hydrologists, soil scientists, foresters, and engineers. The Forest Service believes this to be the best professional approach for achieving the objectives of the National Forest Management Act, and resource management goals in the Tongass Land Management Plan.

Forest Service Policy Based on Research

Many research studies have been, and are being, conducted in Southeast Alaska on habitat requirements of anadromous and resident fish, effects of land-use activites on fish habitat, and fish habitat enhancement opportunities. Results are incorporated into Forest Service policies and prescriptions. Research has pointed out the substantial variability in conditions, and the opportunities and need for similarly variable prescriptions. An example is large woody debris. Previously, biologists and others believed all logging debris had to be removed from streams to protect fish habitat. Forest Service policy reflected that belief. Through research, it was determined that some large woody debris in streams is needed to protect fish and to increase salmon and trout production. Current policy and management practice provides for enough debris for fish habitat and retention of standing trees nearby for future replacement.

Research has identified other ways to protect and enhance fish habitat. In some locations, increased light reaching the stream is needed to increase fish production, further pointing out the need for individual prescriptions based on local conditions and characteristics.

. . . In Summary

Existing federal laws, regulations, and policies provide the needed direction to protect fish habitat on the Tongass National Forest. They permit recognition and allowance for the tremendous variability in conditions and the wide range of respective management opportunities available and often necessary to achieve overall National Forest management objectives.

Ketchikan Pulp Company

A subsidiary of
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March 2, 1990

Honorable Bennett J. Johnston
United States Senate
136 Senate Hart Building
Washington, D. C. 20510

Dear Senator Johnston:

Mr. James Brooks' (NMFS) testimony at your hearing on February 26, 1990, states that the NMFS buffer strip policy - 30 meter minimum - is "based on scientific evidence." This is not precisely correct. Most all biologists agree that buffer strips are necessary on anadromous fish streams, but the required extent of those buffer strips is not well documented or even well understood. It appears that, in many cases, less than 30 meters will suffice and in some cases more than 30 meters will be necessary. Further, there are many cases where a prohibitive buffer strip policy can cause more problems than it will resolve. For example:

1. Blowdown, exacerbated by leaving windthrow prone trees, can greatly increase erosion of streambanks on certain channel types. This blowdown can also cause fish blockages or even debris dams that could cause a catastrophic washout (see attached Koski paper from 1986 Canadian Journal of Fisheries and Aquatic Sciences).
2. Disallowing yarding across portions of certain minor fish streams will necessitate additional road construction. The impacts from these roads might exceed the impacts from fully suspending logs across selected portions of minor streams.
3. Not all class 1 streams are the same size. Can you imagine a 3 foot wide fish stream with a 6 foot diameter tree falling full length in it?

TL:280

Trees are a Renewable Resource

Mr. Brooks stated that he believes there is no case where streams can be enhanced through careful manipulation of buffer strips, yet in a 1984 paper from the Pacific Northwest Stream Habitat Management workshop (attached) and again in a 1986 North American Journal of Fisheries Management paper (also attached), Mr. Koski indicates that enhancement is possible.

Mr. Brooks' attitude toward 100' buffer strips on minor fish streams and complete watershed setasides for the "important salmon producers" indicates that he is advocating absolute protection of every single potential fish. This is not the "multiple use" concept that the U. S. Forest Service is charged with. In any case, the biologists I have talked with assure me that there is no evidence that a minor impact on habitat will result in a measurable reduction in the number of fish produced by any particular stream.

Indeed, streams are not fragile, ancient, unchanging ecosystems; they are in a constant state of change. Natural sediment is constantly being moved through a stream. Trees (large woody debris) in streams continually come and go. Openings in the forest canopy are ever changing and catastrophes of nature are a fact of life. Mt. Saint Helens blew up in 1980 and devastated streams in Washington state. Yet, within the last ten years many of these streams have substantially recovered. The south fork of the Toutle is open for sport fisheries again. The north fork has not recovered as well because massive amounts of sediment are being deposited annually.

Please do not unnecessarily lock up vast acreages of the timber we depend on and constrain the U. S. Forest Service's ability to manage the forests. We are proud to have participated in many stream enhancement projects and we anticipate more projects in the future. Surely the positive benefits to fisheries management from the timber industry should be weighed against any potential negative impacts.

Sincerely,

Owen J. Graham

Owen J. Graham
Timber Division Manager

:ts

TL:280

Preliminary 1988 Southeastern Alaska commercial salmon harvest by species and management area.

Management Area	Chinook	Sockeye	Coho	Pink	Chum	Total
Southern Southeastern						
Portland Canal gill net	2	116	17	230	500	864
Annette Island gill net	1	27	7	364	115	514
Annette Island trap	0	2	0	34	0	37
Neets Bay	0	0	0	0	9	10
Lower Clarence	0	0	0	21	2	23
Prince of Wales gill net	1	93	13	69	70	246
Stikine River gill net	0	1	0	0	3	5
Wrangell Narrows	2	0	1	0	0	3
Blind Slough	1	0	0	0	0	1
Southern hatcheries	10	2	12	118	528	670
Southern districts seine	11	642	131	7,974	817	9,575
Southern Southeastern total	27	883	181	8,811	2,045	11,947
Northern Southeastern						
Taku-Snettisham gill net	2	39	45	157	140	383
Lynn Canal gill net	1	352	81	208	378	1,020
Yakutat gill net	1	162	206	120	29	518
Northern hatcheries	0	0	1	41	194	237
Northern districts seine	1	13	25	1,296	654	1,990
Northern Southeastern total	5	566	358	1,824	1,395	4,148
Southeast Troll 1/	231	9	500	520	88	1,349
Miscellaneous 2/	1	2	3	47	7	60
SOUTHEASTERN REGION TOTAL	265	1,460	1,043	11,202	3,535	17.505

1/ Includes catch from Winter Troll Fishery (October 1, 1987 - April 14, 1988).
2/ Test Fishery, Salmon Derby, Public Safety, Etc.

Compiled 13 January 1989, catches in thousands of fish.

Preliminary 1989 Southeastern Alaska commercial salmon harvests by species and management area.

	SPECIES					
Management Area	Chinook	Sockeye	Coho	Pink	Chum	Total
Southern Southeastern						
Tree Point Drift Gill Net	1.82	144.93	31.95	1,347.86	298.18	1,824.66
Prince of Wales Gill Net	1.53	192.73	92.35	1,101.19	67.38	1,455.18
Gillnet Hatchery Terminal	1.87	0.28	3.17	2.09	11.37	18.78
Stikine River Gill Net	0.30	10.08	4.26	27.64	3.37	45.65
Southern Districts Seine	14.89	738.70	276.30	41,296.84	754.18	43,080.91
Annette Island Trap	0.32	2.73	0.47	496.36	0.48	500.36
Annette Island Gill Net	0.36	33.19	21.26	823.08	52.71	930.60
Blind Slough	0.07	0.00	0.00	0.00	0.00	0.07
Southern Southeastern total	21.16	1,122.64	429.77	45,094.96	1,187.61	47,856.18
Northern Southeastern						
Taku-Snettisham Gill Net	1.81	76.01	51.80	180.59	36.97	347.18
Lynn Canal Gill Net	1.99	471.93	50.30	110.43	123.67	758.32
Yakutat Gill Net	0.79	329.46	176.70	57.17	16.23	580.35
Northern Districts Seine	2.73	98.32	56.33	11,970.77	336.80	12,464.95
S.E. Hatchery Cost Recovery	18.80	0.71	3.43	243.69	166.13	432.76
Northern Southeastern total	26.12	976.43	338.56	12,562.65	679.80	14,583.56
Southeast Troll 1/	240.22	17.95	1,364.04	1,659.38	60.23	3,341.80
SOUTHEASTERN REGION TOTAL	287.48	2,115.00	2,132.37	59,316.77	1,928.44	68,787.86

1/ Includes catch from Winter Troll Fishery (October 1, 1988 - April 14, 1989).
Compiled 04 January 1990, catches in thousands of fish.

COMMERCIAL SALMON CATCH, B' PECIES AND YEAR
AREA: SOUTHERN SOUTHEASTERN ALASKA

Alaska Department of Fish and Game
Division of Commercial Fisheries
P.O. Box 3-2000; Juneau, AK 99802
(907) 465-4210

Thousands of Fish

YEAR	SPECIES						COMMENTS
	Chinook	Sockeye	Coho	Pink	Chum	All	
1937	608	1056	866	20968	3042	26542	
1938	485	1071	1339	20206	2815	25937	
1939	152	1098	714	17452	1843	21260	
1940	56	851	1106	18495	2191	22698	
1941	95	1007	1563	37016	1592	41273	
1942	377	953	1413	19609	3136	25511	
1943	145	532	1272	13165	3136	18252	
1944	151	823	940	9948	3048	14912	
1945	257	826	1989	16294	1779	21147	
1946	298	402	1832	21317	2401	26252	
1947	318	249	997	10680	2121	14368	
1948	266	243	1324	12770	3094	17698	
1949	256	220	1563	33980	1953	37773	
1950	186	265	1030	7734	3340	12540	
1951	210	280	1257	16392	1806	19947	
1952	263	457	637	6334	2497	10190	
1953	203	606	525	3797	1466	6599	
1954	168	439	615	6462	987	8673	
1955	150	234	466	5248	386	6488	
1956	106	336	365	10076	1535	12421	
1957	121	300	488	4683	1627	7221	
1958	138	541	499	6459	1169	8807	
1959	150	364	353	3569	522	4961	
1960	123	210	293	1541	521	2691	
1961	100	212	399	3874	1044	5630	
1962	72	344	642	11007	971	13039	
1963	83	298	385	5145	637	6550	
1964	117	446	722	11258	1192	13737	
1965	102	485	593	5710	289	7180	
1966	113	445	598	15649	705	17512	
1967	107	579	168	661	289	1787	
1968	110	309	658	15200	1263	17541	
1969	95	268	120	1197	69	1752	
1970	114	185	282	5411	643	6637	
1971	125	236	431	6267	704	7763	
1972	161	442	823	9153	1029	11610	
1973	113	421	380	4555	791	6232	
1974	152	346	661	4220	695	6054	
1975	143	116	270	3330	373	4232	
1976	104	254	294	5157	509	6322	
1977	61	647	326	11242	427	12703	
1978	95	455	695	18424	648	20320	
1979	126	552	546	6992	330	8548	
1980	85	742	549	12907	842	15126	
1981	88	719	668	13469	351	15270	
1982	101	836	762	12945	811	15459	
1983	92	934	827	31445	512	33812	
1984	68	636	696	19637	1831	22867	
1985	73	1129	982	30723	1393	34302	
1986	62	899	1520	44427	1788	48697	Nov. 1, 1986 Prelim.
1987	10	534	246	4619	1091	6300	
1988						11947	
1989						47856	

EXHIBIT 9
Page 1 of 1 Page(s)

The CHAIRMAN. Thank you very much, Mr. Finney.

Next we will hear from Kate Troll, who is the Executive Director of the Southeast Alaska Seiners Association.

STATEMENT OF KATHRYN TROLL, EXECUTIVE DIRECTOR, SOUTHEAST ALASKA SEINERS ASSOCIATION

Ms. TROLL. Thank you.

I am also here on behalf of United Fishermen of Alaska. First I would like to give you a little bit more background. I too have a master's degree in forest science from the Yale School of Forestry and Environmental Studies. I have practiced in this field for the state and local government and private sector, as well as Native organizations.

United Fishermen of Alaska is a private nonprofit statewide organization for 23 local fishing associations, has a total membership of about 18,000, thereby making it the largest fishing association in America.

I would like to start by reminding you that the seafood industry is the largest private industry in southeast Alaska, and I too can produce the McDowell report to substantiate that and I would be glad to do so.

Commercial salmon fisheries rely on literally thousands of large and small stream systems to provide fish for harvest. It is the accumulated production of such streams that make for a viable salmon industry.

As such, we are keenly interested in stream and watershed protection, that they be legislated as part of Tongass timber reform. We believe this can be accomplished and should be accomplished while maintaining a viable timber industry. It is not an all or nothing type of proposition.

We seek streamside buffers in direct response to the inadequate protection currently provided by the Forest Service. A minimum 100-foot buffer is advocated for more than large woody debris. Mr. Don Finney would like to make you think that is the only concern as to why we have buffers and the NMFS policy was developed.

But it is also for stream temperature regime, water quality, sedimentation. It is for the whole mix of things, and there are studies to show that if you have a 100-foot leave strip that the temperature regime within that 100-foot will be very similar to that of an unlogged forest.

He fails to mention these other important factors that are all part of the NMFS policy.

I would also like to go into a little bit about the amount of timber needed for retention for streamside habitat. We do not look at it as timber lost; we look at it as timber retained for fish. Fish need timber.

Mr. Finney points out rather exaggerated figures by saying that H.R. 987 includes all Class III streams. It does not. It is just a handful of Class III streams. The focus is on Class I and primary tributaries, that being Class II. When you get to that level, you are talking five to ten percent timber retention for fish habitat starting from the ground up when you look at adding what amount of timber will be necessary above and beyond what the Forest Service is now doing, which is some improvement.

One example is the long-term timber sale for KPS. We are talking a net adjustment of 215 acres out of a total harvest of 812,000 acres for 100-foot buffers on Class I and II streams. Class III streams would add a few hundred acres more.

This is well within the realm of multiple use and economic practicality. It is for these reasons that UFA views the buffer strip provision as a pro-logging, a pro-multiple use management tool.

So the question then becomes why a prescriptive tool, as opposed to a site-specific approach? I think the answer lies again in the Forest Service's practices. The AHMU handbook is a nice, three-inch document, which I have tried to get through and was lost by it, like many others.

But I think the best example is a quote that I would like to take out of the EIS once again, and that is, as of 1988, one-third of the existing aquatic habitat management units—they call them AHMU's—have been harvested. Past harvest in the AHMU has been concentrated on sensitive anadromous channels, with two-thirds of the past harvest taking place on Class I streams.

This statement makes apparent two flaws in the AHMU flexibility system: one, fisheries biologists do not make the decisions on riparian management. They have no enforceable field presence.

Two, there is a variable commitment to adequate non-timber staffing over the life of the timber sales.

Under the AHMU flexibility system, commonly logging interests win over fisheries interests when push comes to shove for those valuable money trees. We need money trees, too, for our money fish. We think there is more money trees left for them as well.

The Forest Service is quick to point out that the riparian management practices have changed. Well, we might see some spot improvements in some areas, but there is no consistency. As part of my written testimony, I provided you with a report prepared by Alaska Department of Fish and Game which shows that the Forest Service has actually gone in and logged buffer strips that were once reserved.

That also is supplemented by an additional report which shows that they are still currently logging up to the stream banks on some important anadromous streams. There just is no consistency.

So it is our opinion that the site-specific approach is not working, and there are substantial advantages to a minimum 100-foot buffer strip along Class I, II, and important Class III streams, first of all including the protection that is needed, as Dr. K. Koski pointed out.

The second one is it is a more effective, efficient, and enforceable policy for all to follow. Even the timber operator will gain by knowing ahead of time what is expected of him in logging next to streamside areas.

Despite the request of NMFS and United Fishermen of Alaska and all the political and legal attention the buffer strip issue has received, future Forest Service practices are likely to remain the same as they are today.

A case in point is the ongoing revision of TLMP. Right now the Forest Service is generating management alternatives. The NMFS policy is not part of those management alternatives. It is not even being evaluated for regionwide application. So we have every reason to believe that TLMP means status quo, and we find the status quo unacceptable.

There has been a lot of discussion here about we need to treat Tongass like the other national forests and let the planning process go on. No other national forest has a Congressionally mandated harvest. No other national forest has a 50-year timber contract.

Therefore, you have the multiple use scheme out of balance. You have the interests and the emphasis on timber. We would like to have that multiple use back in the balance.

The sideboards that are on the TLMP planning process and the current activities that we see by the Forest Service indicate that TLMP means status quo. Another example of this is in their analysis on fish. Under all analyses we have 130 million pounds of fish being produced, even under the maximum timber alternative.

That indicates that the Forest Service says: Well, maximum timber harvest will have no impact on fish, so all we need to do is think about fish when we get within this 100 feet. It is consistent in all their alternatives, 130 million pounds of fish, which is less than half of what was produced this year by Mother Nature.

So buffer strips are a management tool for areas that will be logged. Buffer strips are not a substitute for managing entire watersheds for no-logging activities. In the bigger picture of where to cut and where not to cut, United Fishermen of Alaska support a roadless designation, a LUD-II designation, for important fisheries areas, and I have listed those in my written testimony.

Primarily the ones I need to emphasize right now are those that are on the negotiating chopping block. The Southeast Conference position and things that came out of the last negotiations showed that you were prepared to pretty much cut the heart out of the million dollar fisheries, the Chuck River, the Nutkwa, the Katishan, the Lisianski. Anan Creek got dropped completely.

It was obvious that the give and take had serious consequences for the commercial fishing industries. You have the Chuck River set-aside without the Chuck River, for example.

We find those sorts of things objectionable. We expect that, if there are going to be any changes being made to the size of the areas, that you do it by keeping the watersheds intact.

The original Southeast Conference position recognized that value of intact watersheds. The ramrod revision of Southeast Conference ignores that.

I can get into Southeast Conference later with any additional questioning, but I will keep it short by letting you know that all eight fishing associations that belong to UFA adamantly opposed the revision that was presented and our points of concern were pretty much ignored. So you have got the largest seafood industry—the largest industry in the southeast not being an active part of the revised Southeast Conference position.

In closing, I just would like to get a little bit philosophical, and I will be short. I feel like the challenge of the 1990's is to find that balance between economics and the environment. I like to call it the "environomic solution."

There are ways to protect the environment without causing massive layoffs. Buffers are one example. There are long-term economic payoffs for conservation and protection. An example of that is the fish and tourism dollars returned by the set-aside areas.

The economy and the environment are linked. They are not diametrically opposed. I feel it is time to promote the linkage in any and all legislation that comes before this committee.

You no longer have the luxury of passing a separate jobs bill and a separate wilderness legislation. The needs of the economy and environmental protection must be weighed simultaneously.

As you know, Tongass timber reform is only one example of the environomic challenge for the 1990's, and finding the balance between the economy and the environment can be a difficult task. However, you have two documents to guide you. I believe United Fishermen of Alaska's position on Tongass is one, as well as the original Southeast Conference position.

Like the fishermen in Alaska, most Americans want to be gainfully employed while raising their families in a clean and prosperous environment. Like the fishermen in Alaska, polls show that most Americans are now willing to accept paying the economic cost of protecting the environment.

Like the fishermen in Alaska, many now sense the inescapable linkage between a stable economy and a healthy environment.

I feel it is time to cast a new image for Alaska land legislation, to do away with this image of wilderness versus development. We always see Alaska land legislation in that concept of a battleground, and I would like to see it cast as a breaking ground for this balance of economy and the environment.

Thank you.

[The prepared statement of Ms. Troll follows:]

TESTIMONY OF
KATHRYN TROLL
ON BEHALF OF
SOUTHEAST ALASKA SEINERS ASSOCIATION
AND
UNITED FISHERMEN OF ALASKA
BEFORE THE
SUBCOMMITTEE ON PUBLIC LANDS, NATIONAL PARKS AND FORESTS
SENATE ENERGY AND NATURAL RESOURCES COMMITTEE
FEBRUARY 26, 1990

I am Kate Troll, Executive Director of the Southeast Alaska Seiners Association. I am here today to testify on behalf of Southeast Alaska Seiners Association (SEAS) and United Fishermen of Alaska (UFA) concerning the buffer strip and watershed protection area aspects of the debate over Tongass timber reform. For the record, I have a Master's degree in Forestry from Yale University.

The Southeast Alaska Seiners Association, based in Ketchikan, represents over 350 fishermen and their crews, and over 60 businesses including the major processors in Southeast Alaska. These businesses and fishermen reside in Alaska and Washington. The main purpose of SEAS is to maintain a viable salmon purse seine industry in Southeast Alaska.

The United Fishermen of Alaska is a private, non-profit, statewide organization for 23 local fishermen's associations, including marketing and aquaculture organizations and specific gear groups. Including its individual members, UFA represents 18,000 commercial fishermen, and as such is the nation's largest commercial fishing organization. In addition to SEAS, seven other UFA organizations depend on the waters of Southeast Alaska for fishing: Alaska Longline Fishermen's Association (Sitka); Alaska Trollers Association (Juneau); Northern Southeast Regional Aquaculture Association (Sitka); Petersburg Vessel Owners Association (Petersburg); Seafood Producers Cooperative (Juneau); Southern Southeast Regional Aquaculture Association (Ketchikan); and the United Southeast Alaska Gillnetters (Juneau).

I am sure you are aware that commercial fishing is the largest private industry in Southeast Alaska. It accounted for almost 12000 jobs in the harvesting sector alone in 1986, when fishermen earned more than $109,000,000. Salmon fishermen, who harvest fish spawned and reared in the forested streams of Southeast Alaska, grossed an estimated $125,000,000 in 1989.

I appreciate this opportunity to testify on two aspects of the Tongass that are of critical importance to the groups I am representing today. Commercial salmon fisheries rely on thousands of large and small stream systems in Southeast to provide fish for harvest. (Sports fishermen have their own economic story to tell, but they, too, are dependent on the streams of Southeast for the pursuit of their interests.) It is the accumulated production from all these streams that makes for a viable salmon fishing industry. Is there any wonder why we are so concerned that appropriate stream and watershed area protections be legislated as part of Tongass Timber Reform? This can, and should, be accomplished while assuring a multi-faceted economy in Southeast Alaska.

Let me present our views on buffer strips and watershed protection.

Buffer Strip Provision

Ccommercial fishermen have consistently sought streamside buffers in the Tongass National Forest, in direct response to the Forest Service's **inadequate** protection/managment of streams in Southeast Alaska. A minimum 100 foot no-cut buffer is advocated for areas that will be logged. It is a management tool for logging in a multiple use manner. Given the minimal amount of timber needed for streamside retention (See Attachment A) UFA clearly views the buffer strip provision as a pro-logging/ pro-multiple use managment tool. The question then becomes why is this prescriptive managment tool necessary, rather than the site-specific approach. The answer lies in an explanation of past and current Forest Service practices and management and implementation advantages. With the exception of recent fish kills, this testimony will leave the science behind buffer strips for the National Marine Fisheries Service (NMFS) to amplify.

Forest Service Practices

The Forest Service has used a 3 inch handbook called Aquatic Habitat Management Units (AHMU's) to guide site-specific streamside management/protection along fish streams and tributatires. The AHMU approach does not mandate any exclusive zone of no harvesting. Along with this handbook, the Forest Service mapped out AHMU's according to their fisheries values:

> Class 1 - anadromous streams, including those streams that have the potential to become anadromous with enhancement work.
> Class 2 - resident fish streams
> Class 3 - all other non-fish streams

While the professional tools to manage wisely for riparian habitat may be present in this cumbersome approach, it is only successful if there are enough fisheries biologists to be present for enforcement in the field on all units. The first flaw is that the fisheries biologists do not make the decisions on riparian management; the district ranger does. The second flaw is in a commitment to adequate non-timber staffing over the life of the timber sales. These flaws are apparent in the Forest Service's track record, which is best exemplified in this statement from the Forest Service's Final EIS on the Long Term Timber Sale for Ketchikan Pulp Company:

> "As of 1988, one-third of the existing AHMU's has been harvested. Past harvest in the AHMU has been concentrated on sensitive, anadromous channels with two thirds of the past harvest taking place on Class I streams."

Under the AHMU flexibility system, the logging interests win over fisheries, when push comes to shove, for the valuable riparian timber. The Forest Service is quick to respond that that is not true today. They are quick to point out that the logging practices which decimated the Staney Creek and Harris River watershed are no longer practiced. Yet, a recent review of the '84-'89 long term timber sale by Alaska Department of Fish and Game (ADF&G) biologists revealed that many "salvage areas" for old growth retention and buffer strips had in fact been logged subsequent to having been "reserved". (See Attachment B). Another monitoring report by ADF&G reveals that they are still cutting right up to the streambank on some anadromous streams (See Attachment C). With these ongoing violations and inadequate measures to protect anadromous streams, UFA believes that a minimum buffer strip policy is still essential. The site specific approach is clearly not working.

Future Forest Service's practices are likely to remain the same as they are today. The ongoing revision of TLMP does not include the NMFS's buffer strip policy as a management option for generating alternatives and benchmarks. In essence, we are not certain the NMFS policy is even being evaluated for region-wide implications. Given the high political and judicial profile this issue has been receiving, it is insulting to the fishing industry and the commmunities dependent on it to exclude the NMFS policy in the TLMP planning process. It is obvious that the fishermen of Southeast Alaska need Congressional action on the buffer strip policy now. **Waiting for TLMP means accepting status quo, which is unacceptable to UFA.**

Management and Implementation Advantages of NMFS's Buffer Strip Policy

The minimum 100 foot no-cut buffer strip along Class I, II, and important Class III streams has the following advantages:

1) Establishes a clear, consistent policy easily understood by biologists, rangers, operators, and fishermen.
2) Makes more efficient use of fisheries biologists by freeing their time to concentrate on the maximum width of the buffer, and on enhancement and restoration projects.
3) In times of lean budgets a minimum level of protection is assured, even with reductions of staff.
4) Everybody, especially the timber operator, will know "up-front" what is expected of timber harvesting along these streams.
5) Monitoring of compliance can be more easily conducted through aerial surveys.

Fish Kills

With the headlines this summer about fish kills, the question of logging killing fish has surfaced again. First let me set the record straight, no one is saying that logging caused the fish kills in Southeast - not the ADF&G biologists, not the fishermen, and certainly not the loggers. Because the Forest Service has never conducted the research and monitoring program, (they claimed they were going to establish such a program two years ago) no one can say with any certainty that logging causes fish kills. However, current science and common sense tells us that logging tends to exacerbate the life threatening effects of low-water volume. Science and common sense also tell us that one way to minimize the threat of fish kills within stream systems slated for logging is to establish a 100 foot buffer strip along fish streams and tributaries. Here is a summary of key observations and facts:

OBSERVATION: Low water conditions and lack of rain are the primary agents leading to the fish fills that happened in Southeast in 1989. (Allan Foutch, Koncor Forest Products and Phil Doherty, ADF&G biologist)

FACT: "Logging activities can initiate pronounced temperature changes by the removal of forest vegetation along channels." (The conclusion of a scientific review of over 100 studies on: Stream Temperature and Aquatic Habitat: Fisheries and Forestry Interactions, including Alaskan research by NMFS)

FACT: "High temperatures can be an exacerbating factor in fish kills because warmer water contains less oxygen than cooler water." (M.L. Murphy: Die-offs of pre-spawned adult pink salmon and chum salmon in Southeastern Alaska. N. America Journal Fisheries Manual 5(2B): 302-308, 1985)

FACT: "Buffer strips with widths of 30 meters or more generally provide the same level of shading as that of an old growth stand." (I. Steinblums: Designing stable buffer strips for stream protection. Journal of Forestry 82(1): 49-52, 1984)

OBSERVATION: In 1989, fish kills were observed in the logged tributary of Trocadero Creek while no fish kills were observed at the same time in the unlogged tributary of Trocadero Creek. 1989 fish kills on logged systems generally occurred before fish kills on unlogged systems. (Phil Doherty and Gary Gunstrom, ADF&G biologists)

Until conclusive studies are done, UFA feels that these facts and observations merit the conservative approach of assuming that buffers will ameliorate the life threatening effects that low water and high temperature have on spawning salmon. This conservative approach is also justified by the economics of salmon.

Concluding Statement on Buffers

Given the pattern of inadequate stream protection/management, given the lack of commitment to improve such practices as exemplified in the current TLMP revisions, given the common sense approach to minimize fish kills, and given the minimal amount of timber needed for riparian retention, UFA urges the Senate to adopt a buffer strip policy similar to that included in H. R. 987 . This request is well within the multiple use objectives of the Tongass National Forest. Furthermore, this request is well justified by long-term economic return. One economic analysis (See Attachment D) concluded that the present net value of a foot of riparian vegetation returns $2.19 in coho salmon production and $1.25 in timber production.

Set Aside Areas

Buffer strips are a management tool for areas that will be logged. Buffer strips should never be subsitutes for managing entire watersheds for non-logging activities. In the bigger picture of where to and where not to log, UFA supports legislating permanent protection through LUD II designations for the important fishery areas designated in H.R. 987. UFA has consistently supported setting aside entire watershed areas, as spelled out in Attachment E. In reviewing the results of Tongass negotiations last session it is clear that radical adjustments were being proposed for areas with high fishery values. (UFA was pleased to see that the important commercial fishery river systems along the Yakutat Forelands were proposed for protection during last fall's negotiations.) Rather than address all the set aside areas with fishery values, UFA would like to bring to your attention the high fishery values for those areas reported to be on the negotiating "chopping block."

Chuck River: TLMP rated the Chuck River watershed as the highest value for fish. Chuck River is among one of the highest producers of pink salmon in Southeast Alaska, with a recorded peak escapement of 220,000. The Chuck River supports a significant commercial salmon fishery worth in excess of one million dollars per year to fishermen.

Kadashan River: TLMP rated the Kadashan drainage the highest value for fisheries. The ADF&G and Forest Service have monitored pink and chum salmon escapements into the Kadashan River since 1969 and the out-migration of juveniles since 1977 to predict run strength and manage the commercial salmon fishery in the general area. Since no other stream in northern Southeast Alaska has this quality of data, maintenance of this drainage in its natural condition is very importnat to the managment of the salmon fishery. Kadashan is one of the top five producers of pink salmon in southeast Alaska, with a peak escapement of 282,000 and average escapement of over 130,000 fish. It is among the top ten chum salmon streams in southeast Alaska. The large estuarine grass and intertidal flats make the Kadashan an extremely productive nursery for Dungeness crab and herring. The commercial fishery based on Kadashan salmon is typically worth over a million dollars a year to the commercial fishermen.

Karta River: ADF&G considers the Karta drainage to be one of the most productive anadromous fish systems on Prince of Wales Island. The peak recorded escapements to the Karta River are 136,00 pink, 42,000 sockeye, and 41,000 chum salmon. The estuary is a rearing area for shrimp and dungeness crab and a herring spawning area.

Nutkwa River: TLMP and ADF&G both rate the Nutkwa River drainages as high value for fish and estuarine resources. The Nutkwa system, with its large, shallow salt chuck, is an exceptional producer of pink salmon, with a peak recorded escapement of 215,000 and a major producer of sockeye. The comercial fishery based on Nutkwa salmon is worth in excess of one million dollars a year to commercial fishermen.

Lisianski River: TLMP rated the Lisanski River as having the highest value for the production of salmon. ADF&G concurred in this exceptional rating for the Lisianski fisheries. The Lisianski River is one of the top five salmon producers in the region, with reported peak escapements of 220,000 pink, 5,000 chum and 1,500 coho. The fish produced in the Lisianski drainage supports a commercial fishery on odd years in excess of a million dollars.

Anan Creek: TLMP ranked Anan Creek as among the highest value for fisheries. ADF&G scored Anan Creek at 195 points out of a possible 200 points for fisheries production and value. The peak recorded escapement for pink salmon is 362,000; making this one of the largest salmon runs in Southeast. Anan Creek has also been identified as a temperature-sensitive stream which makes it more susceptible to logging impacts.

Salmon Bay: ADF&G recently estimated the yearly commercial fisheries catch value of Salmon Bay at one million dollars. It produces catches of about 10,000 coho, about

100,000 pinks, 100,000 sockeye, and some chum and steelhead.

These areas are being considered for protection because of a multiplicity of resource values, UFA has only addressed the important fishery values. Because of the overriding fishery values in these areas, UFA believes that these areas can only be protected by keeping the watersheds intact, such protection to be guaranteed by law. **Buffers are not a subsitute for intact watersheds.**

In the course of give-and-take on negotiations for the set aside areas, we found that economic convenience for the timber industry at the loss of the fishing industry appeared to be the prevailing rule. From the fishing industry perspective it does little good to protect areas not critical for salmon production while cutting the heart out of million dollar watersheds. Areas that were being negotiated to be set aside did not have high timber value, they also did not have high fisheries value. While timber value certainly needs to be considered, UFA was disturbed to see this as the driving force for set aside areas, instead of fisheries values.

Again, waiting for the TLMP revision means accepting and getting the status quo, which is unacceptable to UFA. Because of past experience, we have no confidence that, absent a legislated mandate to protect these watersheds, the Forest Service will provide consistent and appropriate protection.

Southeast Conference Tongass Position: The attached UFA letter to Southeast Conference (Attachment F) details how their original position considered the positions of the fishing industry and how their revised position ignores the fishing industry.

Conclusion

The fishermen of Southeast Alaska want resolution of the problems posed by Tongass Timber Reform. We are steadfast in our position that fishing and timber can co-exist in Southeast Alaska. We simply want the Congress to protect all the uses and resources of the Tongass in accordance with multiple use concepts. It is absolutely imperative that the most effective measures available to protect the lifeblood of our fishing industry should be sought in Tongass legislation. We are hopeful that improving forest-wide fish habitat management, avoiding logging in major salmon producing watersheds, and providing a minimum of 100 foot no cut buffer strips along all other fish streams and their tributaries will protect a major portion of Southeast Alaska salmon production. This can be accomplished while maintaining a healthy logging industry. Your challenge is to set about to do it. We continue to want to help achieve resolution on the Tongass.

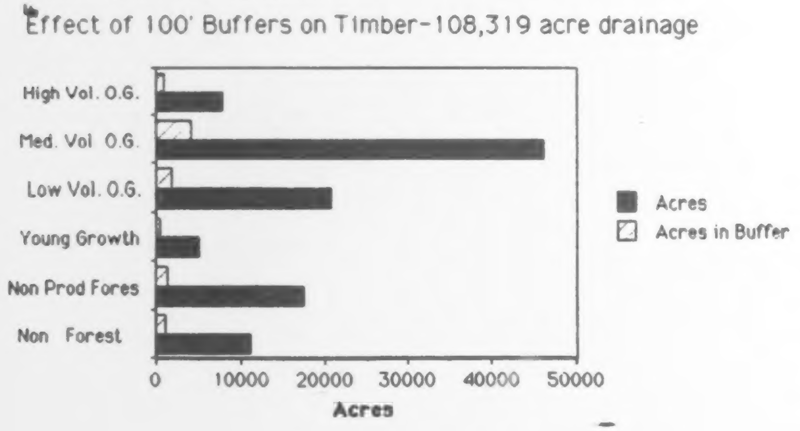
ATTACHMENT A

ATTACHMENT A
HOW MUCH TIMBER IS RETAINED BY A 100 FOOT BUFFER STRIP?

At the request of the Riparian Group working on the Revision of the State Forest Practice Act, the U.S. Forest Service provided information on the effect of 100 foot buffer in a sample drainage. On a representative drainage on Prince of Wales Island, the effect of a 100 foot stream buffer around every visible stream was as follows:

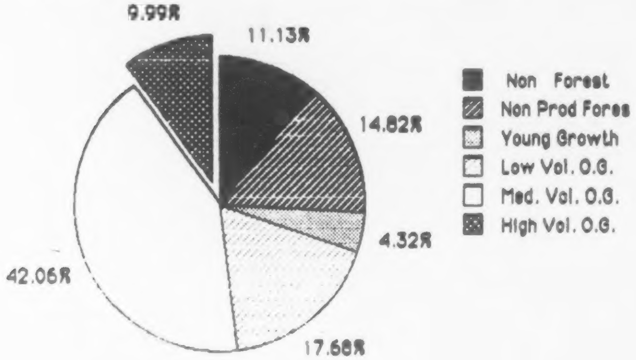
Land Class	Total Acres	Acres in Stream Buffer	%
Non Forest	11,275	1,090	9.7
Non Prod. Forest	17,548	1,452	8.3
Young Growth	4,963	423	8.5
Low Vol. O.G.	20,674	1,732	8.4
Med. Vol. O.G.	46,044	4,120	8.9
High Vol. O.G.	7,816	979	12.5
Total Acres	108,319	9,796	9.0

This data is graphically diplayed below:



This scenario does not include 100 foot buffers around intermittent streams. However it does include 100 foot around visible tributaries that may be considered a Class III stream when in the field, hence limiting this scenario to only Class I and II streams would result in less than 9% timber retention for fish habitat. If one looks at the distribution of timber retained in 100 foot buffer strips, only 10% of the timber left is high volume old growth timber, the timber which drives the economics of timber sales. The distribution of timber types and volumes that would be retained inside a 100 foot buffer is graphically depicted on the following page:

Percent of Timber Type Within 100' Buffers



The Forest Service also provided this information on the effect of their Aquatic Habitat Management Unit (AHMU) system.

	Acres	AHMU Acres	% of Total
Project Area	849,674	89,127	10.5
Operable Area	395,966	42,299	10.7

80% of the volume within the AHMU remain with selective logging allowed inside the AHMU area. The AHMU distance from stream varies from 500 feet to 25 feet or slopebreak.

The Forest Service just released their Record of Decision for the 1989-94 Operating Period for KPC Long Term Timber Sale. This decision includes standards for habitat management that includes a no-cut buffer strip greater than 100 foot on 7 stream classes, yet it includes far less (25 feet in most cases) on 11 stream classes that are within the Class 1 and II system (total 23 stream categories within Class I and II). These standards are incoporated into a modified preferred alternative as a result of the Record of Decision. The Final EIS includes an alternative (Alternative 6) that would basically implement the National Marine Fisheries Service's 30 meter no-cut policy. The Final EIS also includes Alternative 7 supported by Alaska Loggers Association (ALA). Here is a tally of how the Board Foot Volumes compare:

	MMBF	% difference from Alternative 6
Record of Decision	748.1	3%
Alternative 7 (ALA)	825.9	12%
Alternative 6 (30 meter)	720.5	--

As you can see the Forest Service is definetly getting closer to a fish habitat protection mode. Much of this is due to the political pressure brought on by the Tongass Timber debate. The bottomline is that the Forest Service can implement a 100 foot no-cut buffer policy without causing the "big hit" to the timber industry. In fact, if the Forest Service modified the stream standards in the recent Record of Decision to include the 100 foot as a minimum and either went into lower volume classes or expanded some harvesting units the Forest Service could probably maintain the same level of harvest while achieving better fish habitat protection. Through the administrative appeal process, Southeast Alaska Seiners Association has learned that the net effect of the Forest Service's altering the Record of Decision to provide 100 foot-buffer along anadromous streams and their major tributaries is only an adjustment of 215 acres out of a total harvest of 812,427 acres. These adjustments are well within the realm of good forest management and economic practicality.

THE BOTTOMLINE OF THIS DATA IS THAT A REASONABLE APPLICATION OF THE 100 FOOT NO CUT BUFFER POLICY WILL RESULT IN ABOUT A 5-10% RETENTION OF TIMBER FOR FISH HABITAT. Considering that one coho salmon was worth more than a barrel of oil during summer '88, this is a modest investment that costs nothing to leave and returns it's value in fish every 3-5 years. Economics justify mutiple use managment that includes a buffer strip along streams and their major tributatries.

ATTACHMENT B

MEMORANDUM

State of Alaska

TO: Frank Rue, Director

Thru: Rick Reed
Regional Supervisor
Habitat Division
Juneau

DATE: September 14, 1989

FILE NO:

TELEPHONE NO:

FROM: Don Cornelius/Jack Gustafson
Area Habitat Biologists
Petersburg/Ketchikan

SUBJECT: Trip Report - USFS logging activities on Prince of Wales Island - 8/29-31/89

On August 29, 30 and 31, 1989, we joined Glenn Freeman and USFS fish and wildlife staff, Ron Wiley, Cole Crocker-Bedford and Donna Hollingsworth, for an interagency inspection of USFS logging activities in the KPC Long-Term Sale area on northern Prince of Wales Island. During this inspection we reviewed roads and units logged or scheduled for logging under the KPC 84-89 and 89-94 Long-term sales plus salvage sales throughout the area. Although we were interested in looking at a cross-section of current activities, our primary focus was upon the review of riparian management practices. While driving our pre-planned route, we encountered and began noting the large number of "salvage" units within areas identified for old-growth prescription (retention) in the KPC 89-94 Long-Term Sale FEIS. We also cataloged anadromous streams and intended to monitor and provide input for some of the units we had questioned in the FEIS.

The timing of this trip corresponded with a continuing series of recent Forest Service personnel turnovers in Ketchikan and Thorne Bay. We were impressed with the level of fish and wildlife expertise which is available in the Ketchikan area. However, as the fish and wildlife biologists are given virtually no decision making authority, the implementation of suitable habitat protection measures comes almost exclusively from the District Rangers or other line officers.

Rather than providing a chronological narrative of our trip, we'll attempt to group the units we looked at into three broad areas of concern. These include units where we reviewed riparian management practices under the KPC 84-89 Long-Term Sale, units where we reviewed layed out riparian protection under the KPC 89-94 Long-Term Sale, and timber harvest within areas designated for old-growth prescription in the KPC 89-94 Long-Term Sale.

KPC 84-89 Long-Term Sale Units

1. Unit 540-03-4 retained a riparian area as designated in maps of the sale area. This was adequate for this system.

2. Unit 533-11-12, located along anadromous fish habitat in Big Creek (stream no. 106-41-10340), only included a scattered single tree buffer. This was inadequate protection for this stream and will result in long term adverse impacts on fishery resources of this watercourse.

3. Several unidentified units on the east side of Buster Creek (stream no. 106-41-10420) only included single tree buffers adjacent to anadromous fish habitat. This was inadequate protection of this important riparian habitat. Logs were also dragged across V-notches in these units with resultant erosion and destabilization of the stream channels along this hillside area.

4. Unit 529-18-24 was very recently (within the last year?) logged on both sides of Alder Creek tributary no. 106-41-10440-2005. Only unmerchantable timber was retained along the stream banks so that future sources of large woody debris and shade were lost adjacent to this anadromous fish stream.

5. An unidentified unit near the mouth of Alder Creek (stream no. 106-41-10440) cut to the stream with no buffer along the north side of at least 1/4 mile of a C-2 channel. Salmon were spawning in this section of stream. The loss of streambank stability will have long-term adverse effects on anadromous fish in this watercourse.

6. Unit 529-18-29 cut both sides of the headwaters of Alder Creek (stream no. 106-41-10440) with cross stream yarding beginning at the upper limits of cataloged anadromous fish habitat and extending through suspected fish habitat. No streamside trees were left standing. The unit also included logging across V-notches with no stream protection. Two slides into or, at least, to the banks of upper Alder Creek have occurred in association with this unit. The Forest Service has seeded both of these slides, but should not have laid out units on such steep, unstable slopes.

7. Unit 526-60-16 appears to have expanded the boundaries from the FEIS and includes both sides of upper Hole-in-the-Wall Creek at a point above cataloged fish habitat. The catalog is in error since juvenile coho salmon are present in upper portions of the stream. This unit did not include any streamside

buffer so that most of the LOD remaining in the portion of the stream below the bridge is in logjams. The streambanks appear to have been severely destabilized. The extent of streamside cutting in evidence along this watercourse appears to be much greater than indicated on maps which are available. We need to determine if this is another unit which was expanded. At this juncture, the upper limits of anadromous fish habitat need to be ascertained, particularly since the Forest Service constructed a fish pass for pink and chum salmon on this watercourse. This information needs to be added to our Anadromous Waters Catalog. We were also disturbed to find a newly deposited pile of overburden, removed when this bridge was replaced, stacked in close proximity to this stream at a steep angle of repose. Some of this material is expected to enter surface waters. The Forest Service needs to remove or redistribute this material and seed it prior to the arrival of fall storms.

8. According to the FEIS maps printed by the Forest Service, Unit #529-50 was logged in the wrong location. From the way it looks in the field, the original unit location was ignored because of low-volume cedar. It appears the entire unit was relocated to an adjacent area to take in higher volume timber.

9. Near Hole-in-the-Wall, bridge removal at the 20-29 road crossing of stream no. 105-41-10050 (at a point above cataloged fish habitat) resulted in the deposition of excess gravels in the stream channel. This material, which should have been removed before the contractor left the site, is now acting as a French drain during low water levels, thereby blocking fish passage for coho salmon which are present in this portion of the stream. This situation needs to be corrected by the Forest Service to comply with Title 16 fish passage requirements.

KPC 89-94 Long-Term Sale Units

1. Unit 540-104 has not yet been laid-out, but several areas of concern were noted regarding this unit which need to be addressed. This unit borders two ponds at the headwaters of Squaw Creek. The stream is cataloged (numbers 106-30-10820-2003-3003 and 4003) for Dolly Varden to the ponds. However, the culvert through the 3000-540 road at the outlet of the easternmost of these ponds was improperly installed, has not been maintained, and blocks fish passage. This problem needs to be corrected when the road is upgraded for logging this unit. We also noted considerable goose sign in low areas along this road indicating Vancouver

Canada Geese make use of these ponds and adjacent habitat. Thus, it is essential that the lakeside/muskeg buffer described in the KPC 89-94 FEIS be incorporated in this unit layout. Similarly, a streamside buffer is needed along the streams draining these ponds. Unfortunately, this buffer has already been eliminated along the easternmost stream, but some timber is still available close to the stream that can serve as an incomplete buffer between the unit and the watercourse.

2. Unit 540-109 is an early release unit which is in the process of being logged but fails to incorporate resource protection measures identified in the FEIS. Specifically, the FEIS called for a 150 foot buffer between muskegs and adjacent units. This buffer is not only missing along portions of the adjacent muskegs, but an approximately 100 x 150 foot tract of scattered trees (bull pine) in a muskeg has been felled for no apparent reason. There appears to be a serious gap in communication between the FEIS and sale administrators. How would the Forest Service explain this encroachment?

3. Unit 528-104 which flows into Hole-in-the-Wall has not yet been laid-out, but will need to include at least a 100 foot streamside buffer to protect fishery values. Specifically, the uncataloged stream which runs through this unit supports coho salmon. Downstream, this watercourse is cataloged as stream no. 105-41-10050. The upper limits of fish habitat need to be determined by USFS personnel prior to laying out this unit and the upper portion of the stream added to our Catalog of Anadromous Waters.

4. Unit 554.2-100 was a unit of concern identified in the state's consistency determination for the 89-94 FEIS. As we understand the situation, this unit has now been released and a road has been constructed into the unit paralleling an uncataloged portion of a Sarkar Lake tributary which supports coho salmon. A somewhat inadequate streamside buffer has been included in the unit boundary. Also, of significance is the fact that this drainage has been almost entirely logged within a relatively few years so that additional logging will likely affect stream flows. Because the unit contains most of the old-growth left in the drainage, wildlife sign (deer and black bear) was extremely high. With the cutting of this unit, impacts to these species in this watershed will be exacerbated. Logging for this unit does not split on one tributary to the stream and logs to the streambanks of a second tributary which supports resident fish with only split lining as a protection measure. This tributary should be protected with an adequate buffer. We find it difficult to

understand how the Forest Service could release this unit before the Long-Term Sale is found consistent with the ACMP.

5. Unit 571-134 includes an AHMU buffer which we do not feel is sufficient to protect coho salmon habitat in the stream flowing through the unit. Essentially, this is a cut to the break situation with a 25 to 60 foot variable width buffer on either side of this watercourse. We understand there are 9 tributaries located within the unit which we believe need protection. Finally, we understand a 150 foot buffer has been provided around a pond located further upstream. We concur with the layout of this portion of the leave strip, but request that the part that is inadequate be modified.

Old-Growth Prescription Timber Harvest

Logging was found to have occurred this past spring and summer within tracts designated for old-growth prescription (retention) in numerous locations throughout the area. Though the Forest Service is required to follow specific processes in this regard, we have no record of reviewing any EISs or EAs for logging of retention areas, nor was there discussion with the Department concerning logging of these areas. DGC does not have any record of having received information on this logging. All of these areas are indicated for old-growth prescription in the KPC 89-94 FEIS for which the record of decision was signed June 2nd, 1989. The state still hasn't found the Long-term Sale consistent with the ACMP, yet we understand 100 mmbf of timber has been released for harvest.

Based on the angle of repose of the stumps, the vast majority of the timber in all of the "salvage units" was standing when it was cut. The feathering effect of the blown down timber was lost in every instance by cutting the timber (taken to a "logical" setting) to fully standing boundaries. This creates another wall of timber for additional blowdown and presumably, more "salvage" operations.

We would like to know more about the way "salvage" units are selected, the criteria used in determining "significant or catastrophic" blowdown or insect damage, and why approval is given without interagency coordination. We understand KPC receives "purchaser credits" for road construction into these units, rather than paying for the roads with the sale of salvage timber.

Site specific observations related to cutting of old-growth prescription areas are as follows:

1. West side of Turn Creek salvage unit - El Capitan Passage: This unit reportedly salvaged insect damaged trees in approximately 5 acres bordering anadromous fish habitat in a retention area along Turn Creek. Only alders were left along the stream. We would like the Forest Service to provide a copy of the fisheries biologists report for the review of this unit.

2. An approximately 340 acre unit (532-107) on the west side of Red Bay was cut after development of the DEIS but before the review of the 89-94 FEIS was completed. This unit was expanded, without state review, to include at least 20 acres of retention on the east side of the unit. Very little evidence of blowdown was observed in this unit. Thus, an apparently unjustified blown down area of retention was cut as an early entry without any state review.

3. Approximately 2.5 acres of retention were cut below the road at mile 4 of FDR 20 east of Labouchere Bay. This acreage was apparently cut last year across the road from another 8-10 acre "salvage sale" which also did not receive state review. Red flagging was evident adjacent to a wetland area at the back line of this high volume "salvage" unit. Only one tipped up root was evident in the unit, but there were stumps of numerous high-quality spruce. We would like to see the EA which authorized this cutting and find out why our Department was not notified by the Forest Service, as per our previous agreements.

4. Two blown down eagle nest trees and adjacent retention appear to have been cut on Protection Head. The cutting of this retention timber precluded the possibility of nearby standing spruce serving as replacement nest trees. This runs contradictory to one of the intents of leaving buffers around nest trees. Additionally, the two nest trees were bucked and yarded out, which appears to have been a violation of the Bald Eagle Protection Act.

5. An approximately 5 acre currently active rock pit is located in a retention area at mile 3.5 of FDR 20 east of Labouchere Bay and an approximately 2 acre inactive rock pit is located in the retention area at approximate mile 4.5 of the same road. These pits and other similar instances on the Tongass Forest reduce the effectiveness of retention, which may be magnified

when considering the needs of old-growth dependent species which avoid fringes of old-growth. At a minimum it is essential that the Forest Service replace this unusable retention with high value wildlife habitat.

6. The area between Neck Lake and El Capitan Passage has been subjected to intensive timber harvest in past years and only includes limited retention for remnant wildlife values. Two "salvage" units, 25 and 15 acres in size, were recently removed from retention status and logged with no state review. Very few tipped up stumps were evident in these extensive clear-cuts which reduced the value of remaining retention. Given the fragmentation of the retention in this area, we believe an interagency review of this area should consider moving all of the Neck Lake retention to include the entire hillside in extended rotation on the north side of the Lake where we originally requested retention be located.

7. Approximately 25 acres of retention was logged in two parcels above the FDR 20 Road in the area north of Deweyville. This retention was established for a wildlife corridor which is now seriously compromised and reduced in value.

8. An approximately 20 acre portion of old- growth retention west of the Yatuk Creek bridge on FDR 20 was approved for "salvage," and logged. Again, few blown down trees were in evidence and there has been no state review of this action.

9. We further understand that in a unilateral decision, the Forest Service replaced retention identified in the previous item with timber adjacent to unit 571-132. Approximately one acre of this replacement retention was found cut during our review. Tracking retention under the present management philosophy is almost impossible.

10. Some roads (the 20640 road to unit 571-134, for example) go through areas of old growth prescription, a questionable policy in itself. At a minimum, mitigation for putting a road through old-growth retention should be the cutting of the absolute minimum amount of right-of-way timber to provide a road corridor and assigning replacement retention for habitat lost to the right-of-way. We are unaware if replacement retention has been designated, but we were extremely disturbed to find unnecessary 200 foot right-of-way cuts through some retention. Again we find retention bisected and destroyed in value for wildlife.

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11. An approximately 50 acre stand of retention was logged in the Sarkar drainage between Sarkar Lake and saltwater. This tract provided old-growth habitat values and, most significantly, a wildlife migration corridor through this area. What remains are two fragmented tracts of old-growth which clearly have reduced wildlife values and are in turn subject to more wind throw. Had the state been given the opportunity to review the EA for this activity, we would have objected strenuously. Again, where was the EA, what was its distribution, and what attempts were make to coordinate this activity with our department?

SUMMARY

This fairly sizeable list of problems was found in just 2 1/2 days of field review in selected areas within only a small portion of the Long-Term Sale Area. Presuming the same problems exist througnout the sale area, we must assume that considerable impacts to fish and wildlife habitat are occurring as a result of the Long-Term Sales and associated "salvage" sales on Prince of Wales Island. A memo from a past Department of Fish and Game commissioner to a former governor states that, "the Forest Service has traditionally maintained that whatever cutting practices they currently condone do not significantly hazard fish and game values." After thirty years of ADF&G objections to streamside logging, we were told during the 1984-89 operating period that "things were different" and the Forest Service would be "actively managing" the streamside habitat. Unfortunately, history repeats itself, and "active management" during the last operating period did not exclude continued logging up to streambanks. As for wildlife, virtually the only protection TLMP gives to terrestrial vertebrates on Northern Prince of Wales comes through old growth prescriptions (retention). If any retention is harvested or changed, it is not supposed to occur without "significant or catastrophic" loss and must be done in consultation with ADF&G. When both of these cases are violated, or deviate from the published EIS, wildlife is jeopardized and TLMP and other planning processes may be basically invalidated. According to one Forest Supervisor's letter to the Governor's office, "It is true that the Forest Service assured the Alaska Department of Fish and Game that no harvest would occur in retention areas, and that replacement retention areas would not be designated without their concurrence." Areas which were designated as old growth prescription in the DEIS and FEIS, and were clearcut without our concurrence, are unquestionably unacceptable. Clearly, something must be done to change the direction of the Forest Service before retention is irreparably altered beyond

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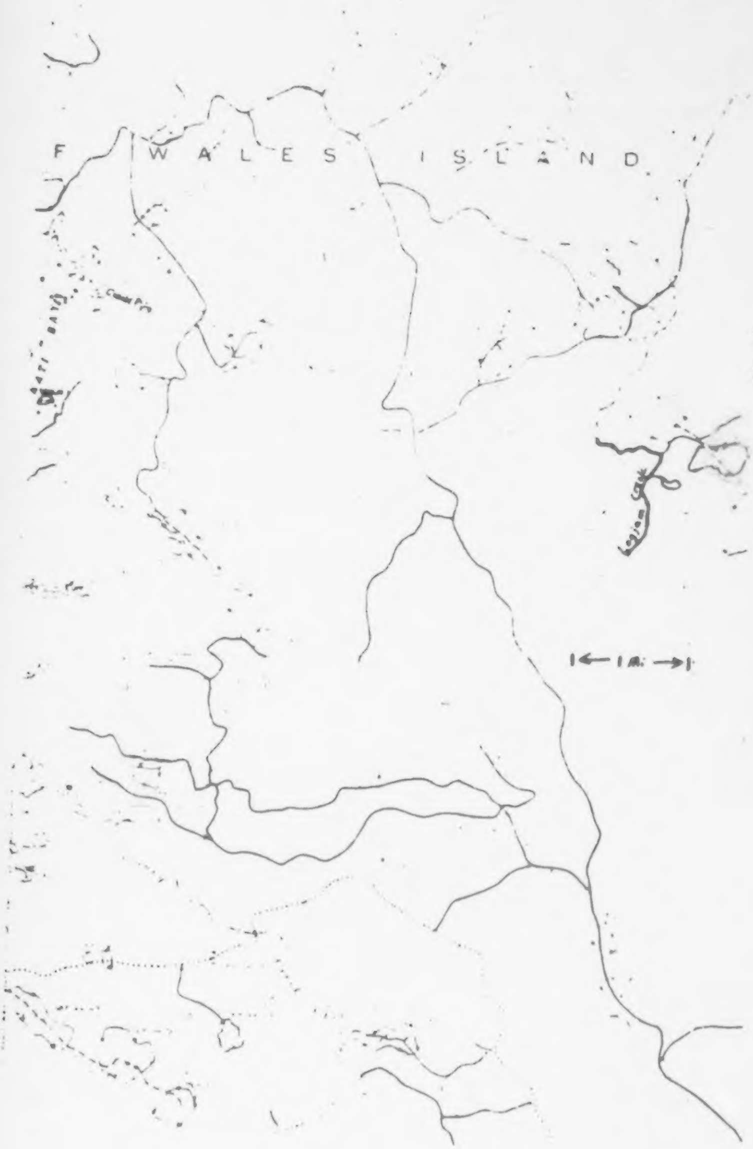
recognition and purpose. The entire effects analysis of the KPC 1989-94 Long-Term Sale FEIS has become questionable, as is the credibility of the agency in its discussions with the state.

cc: R. Reed, Juneau
L. Pamplin, Juneau
S. Marshall, Juneau
L. Shea, Juneau
J. Hall, Juneau
D. Hardy, Sitka
G. Freeman, Klawock
D. Mayer, DGC, Juneau

Attachment 1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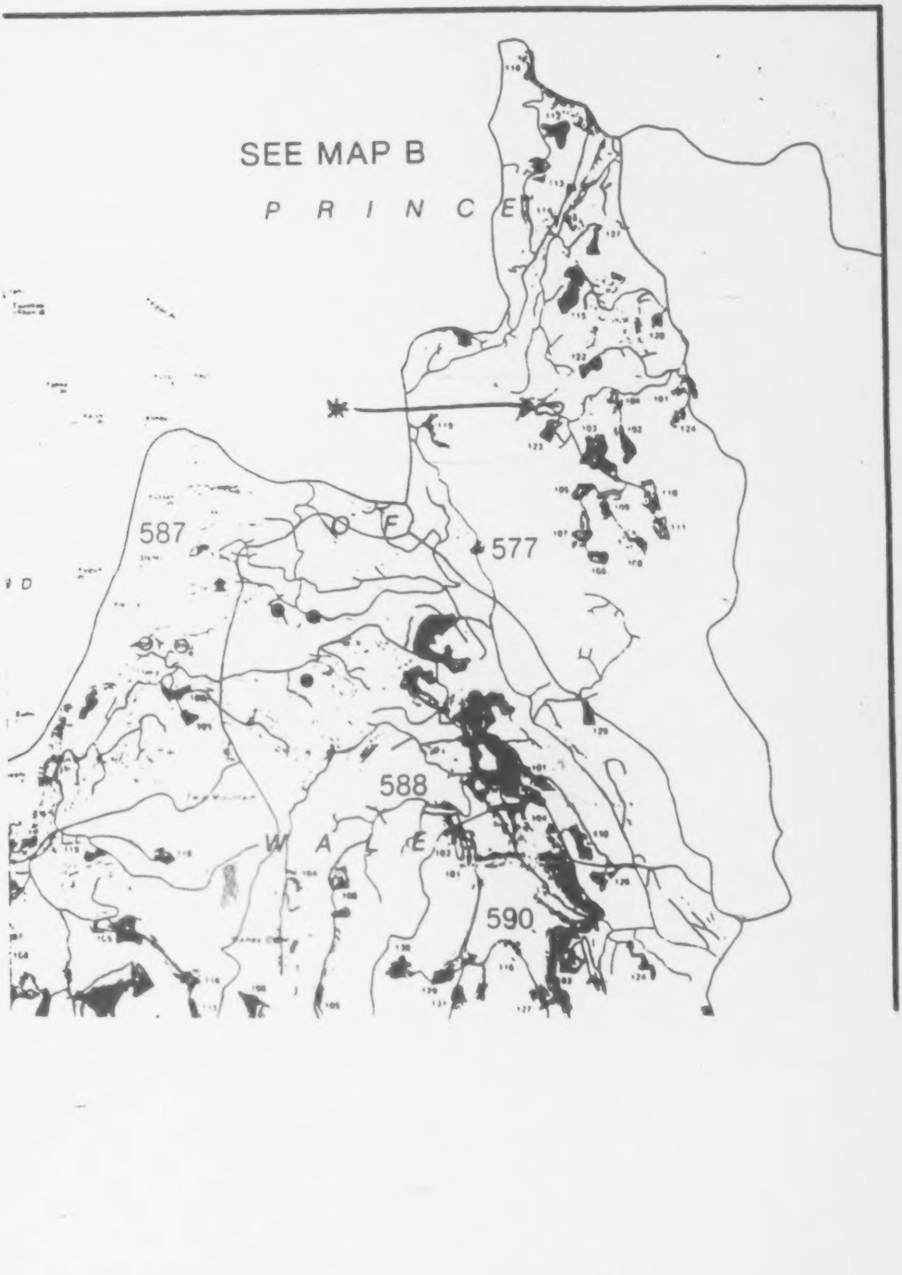
* Unit and roads are not correctly shown on map
Recent clearcutting to streambanks of
Logjam Creek and 5008 tributary.

1989-94 KPC FEIS, Vol. 8 (Maps) Alt. 7, Map C


SEE MAP B
PRINCE
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U. S. DEPARTMENT OF AGRICULTURE - FOREST SERVICE
KETCHIKAN AREA
LOGGING/CONSTRUCTION APPROVAL NOTICE

REPLY TO: 2430 Commercial Timber Sales

Date: ____
UNIT NUMBER: 577-39
ROAD NUMBER: 303500

SUBJECT: Authorization to Begin Logging/Construction

TO: Louisiana Pacific, Ketchikan Division
P.O. Box 6600
Ketchikan, Alaska 99901

The following described layout is released for construction and/or logging, as shown on the attached map and/or plan and profile.

1. Operator ____ Operating Chance ____

2. Description of Approval:

VCU Number — 577
USGS Quad Map No(s) — CRAIG D-4
Section(s) Sec. 28 & 29 T. 69 S, R 81 E.
Acreage — 95
Volume — 3.534 MMBF
Specified Road Miles — .49
Temporary Road Miles — .67
Reconstruction Miles — 0

3. Special restrictions which are a condition of this approval:

A. See Page 4 for stream protection restrictions.

B. Unit must appear on the approved annual operating plan before road construction or logging begins.

4. Erosion Control Plan and Map: See Attached

5. Remarks:

The unit boundary has been marked with pink flagging, and flourescent orange square tags. Road is marked with blue flagging.

Recommended by District TMA Daniel W. Torrence acting TMA Date 3/11/87

Recommended by ER Keith D Miller Date 3/3/87

Approved by:

District Ranger Date 3/18/87

Accepted by:

Roger M. Geisel Date 4/3/87
LPK Representative

cc: LPK - Box 6000
LPK Representative
FS Engineering Rep.
Resources (Original)
District Ranger
Sale Administrator
Presale
Supervisor's Office

Page 1 of 6

EROSION CONTROL PLAN

UNIT 577-39

ACTIVITY	SCHEDULE OF ACTIVITY
1. Temporary Roads	
A. Removal of Culverts and Bridges Approximate No. 3	Before unit is accepted as completed but no later than October 1 of the year yarding is complete.
B. Placement of Water Bars Approximate No. 7	October 1 if unit complete. If unit not complete, kept current with logging operations until seasonal shutdown.
2. Seeding and Fertilizer	
A. Cutbanks of Temporary Roads	Prior to July 15 of year immediately following logging.
B. Roadbed of Obliterated Roads	Prior to July 15 of year immediately following logging.
C. Other Revegetation Needs	Prior to July 15 of year immediately following logging.
1. Skid and swing roads (as required)	
2. Landings (as required)	
3. Approximate seeding acreage .8	
3. Specified Roads	
A. Road Maintenance	Year round in accordance with specification 801. All specified roads will be brought up to standards and approved in writing by the project engineer before unit is eligible for acceptance for completion.

4. Remarks

Placement of water bars will be designated by the Forest Officer in charge. Seeding of landings, swing, and skid roads will be designated by the Forest Officer in charge.

[illegible]

Salmon Spawning and Rearing Streams
(Blue/White Ribbon)

UNIT # 577-39 STREAM # 1,2,3

The following fish stream protection prescriptions and recommendations apply based upon quality of habitat, resistance to alteration, and fish habitat management unit objectives.

X 1. Directional falling (to include lining and jacking) of timber away from streamcourse.

___ 2. Split the yarding on the creek or full suspension of timber over the streamcourse.

X 3. No limbing of timber within or suspended over streamcourse (to include windthrow). Yard timber in lengths to maximize lift.

X 4. Forty-eight hour removal of any debris introduced into streamcourse during timber harvest.

___ 5. Windthrow impacting stream course:

  X a. All windthrow impacting streamcourse will be left in place.

  ___ b. Timber flagged with yellow ribbon or marked "leave" with blue paint will be left in place. All other timber will be removed in lengths to maximize lift and minimize streamcourse disturbance.

___ 6. Time timber harvest within crown height of streamcourse to avoid adverse impact to salmonid redds and/or pre-emergent fry. (Optimum time for harvest approximately May 15 to August 15).

___ 7. Hazard (leaning) trees along streamcourse will be marked by sale administrator and felled concurrent with yarding.

___ 8. All trees which cannot be felled away from the streamcourse will be left.

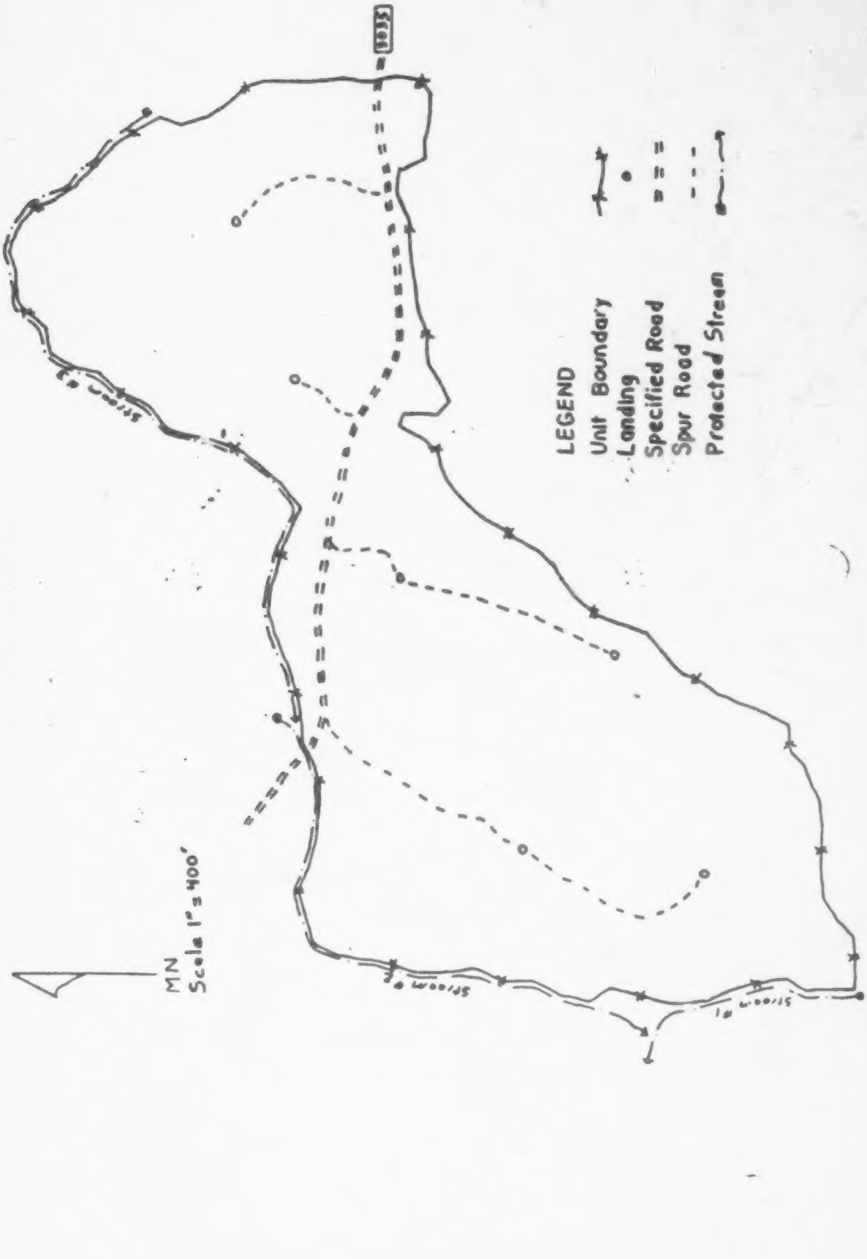
X 9. Leave all nonmerchantable trees, snags, and timber less than 12 inches DBH within 30 feet of the streamcourse if possible.

X 10. Trees designated "leave" with blue paint or flagged with yellow ribbon will not be cut.

Additional Comments:

Although there are excellent spawning areas in streams 2 and 3, timing of timber harvest is not necessary in this unit if adequate directional felling is achieved. The leave trees and the fringe of inaccessible timber along the streams will prevent impacts form timber harvest.

Unit Release Map
Unit No. 577-39


3035
LEGEND
Unit Boundary
Landing
Specified Road
Spur Road
Protected Stream
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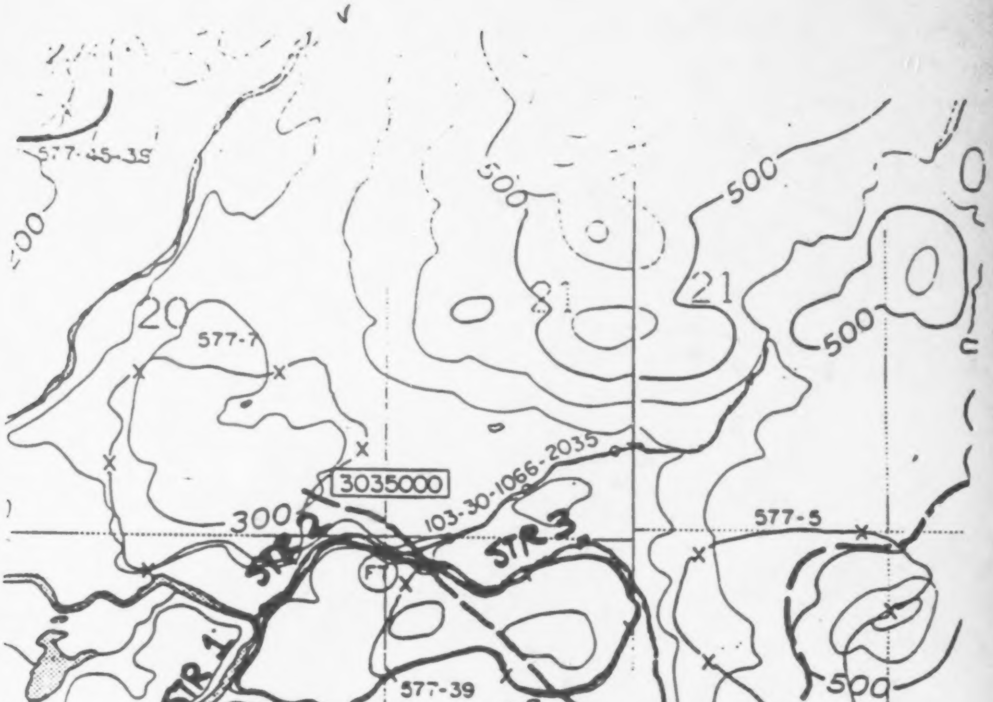
to woods
to woods
MN
Scale 1"= 400'


577-45-35
200
500
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21
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577-7
3035000
103-30-1066-2035
300
STR 2
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577-5
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UNIT #577-39
29
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28
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577-4
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Logjam
32
CRNG D-4, NE

ATTACHMENT C

MEMORANDUM State of Alaska

TO: Rick Reed
Regional Supervisor
Habitat Division
Department of Fish and Game
Juneau

DATE: June 30, 1989

FILE NO:

TELEPHONE NO: 225-2027

FROM: Jack Gustafson
Area Habitat Biologist
Habitat Division
Department of Fish and Game
Ketchikan

SUBJECT: Inadequate Fisheries Protection on Forest Service Lands

As you know, our staffing levels have never been funded to where we can actively monitor Forest Service logging activities. However, while on Prince of Wales Island the week before last, I made a number of observations on Forest Service lands (incidental to the other work I was doing at the time) which cause me to believe that current Forest Service fisheries habitat protection measures are seriously inadequate. We have been told that problems similar to those encountered in the past are no longer occurring. Unfortunately, onsite spot checks earlier this month, supplemented by several other accidental encounters regarding poorly implemented fisheries protection, are convincing evidence that the Aquatic Habitat Management Unit (AHMU, or "active riparian management") concept and other fisheries protection measures do not seem to function in a manner consistent with good resource management principles. Unless some kind of definitive action is taken, I believe we will continue to experience an unacceptable level of impacts to fisheries habitats on this part of the Tongass. Descriptions of some specific examples are as follows:

Logjam Creek: On June 16, Steve Hoffman and I went to survey a small uncataloged tributary of Logjam Creek in T.69S., R.81, S.29. Logjam is an extremely productive salmon, steelhead, trout, and char habitat, with a diverse and prolific abundance of wildlife species also inhabiting the riparian zone. Upon our arrival to Logjam Creek (Stream #106-30-10670-2004-3030) we found that this stream, and its adjacent productive cataloged tributaries (#4021 and #5008), had been freshly clearcut to the streambanks. No significant standing trees (sources of LWD, etc.) were provided to assure the continued future productivity of salmon and trout rearing in the stream. Part of the occasional one-tree "buffer" had already blowdown into the stream, with the anticipated high infusion of sedimentation which typically accompanies such blowdown. Approximately a mile of productive anadromous habitat is essentially permanently affected by the cutting of this unit. I photographed the streamside stumps, in addition to a potentially uncataloged tributary (or, possibly "water quality" stream) which had been felled into and logged through.

Being disturbed as to the process by which recent habitat degradation of this type occurs, I decided to attempt to trace the history of this unit. Significantly, upon examination of the Ketchikan Pulp Company's 1984-89 EIS, I found that the review materials previously made available to the Department of Fish and Game and the public showed that much of the cutting I objected to was not within the unit boundary maps. In fact, on the pre-logging maps made available for public review, the unit boundary remains about a full one-quarter mile away from Logjam Creek, tributary #4021 and a coho rearing wetlands on the south (Attachment A). The post-logging unit boundary, as depicted in the newly released 1989-94 EIS, also shows that the recent logging did not encroach into the same quarter-mile riparian zone shown on the previous 5-year operating period EIS maps (Attachment B).

At this point, I thought I may have mislocated my position on the maps, as neither the pre-nor-post-logging EIS come close to corresponding with what exists in the field. Upon requesting and obtaining the unit release map which the Forest Service transmitted to the Ketchikan Pulp Company (Attachment C), I was shocked to see that the unit boundary had been adjusted to include extensive streamside logging, which corresponded to what was observed in the field. The unit release layout plan was signed by the Thorne Bay District Ranger on March 18, 1987, with logging occurring in either 1987 or 1988.

Questions to which we need answers include:

(1) Why was the layout changed to include streamside logging at the expense of habitat values?

(2) Why was ADF&G not contacted of a proposed change?

(3) Don't changes such as this violate the NEPA process?

(4) Why was no evaluation or mitigation provided to prevent the damages which were inevitable by such a change?

(5) After the unit boundary was changed and the area logged, why was this change not indicated in the new EIS just published?

Of paramount concern, however, is that such changes invalidate the EIS planning process and all of the review that ADF&G and others put into planning efforts, such as the 1989-94 sale currently under review, or the forthcoming TLMP. In consultation with a former Forest Service employee, I was informed that, in his opinion, over 50% of the units get changed from what is delineated in the EIS. This is very disturbing, considering the amount of effort we give to such plans, and the fact that concerned agencies and citizens are not included in the review process when changes are made at the District Ranger level.

Thorne Bay Tributary (T.71S., R.83E., S.4 and 9): Several types of damages were observed on this highly productive uncataloged coho salmon and steelhead trout stream on June 13. The streambanks of the system draining the southernmost Snakey Lake and a smaller adjacent tributary lake have been heavily logged within the past year. Problems include clearcutting to the streambanks; trees fallen and yarded in productive salmon and steelhead habitats; deposition of slash and woody debris in the stream; logs which were fallen, bucked, and left in the stream; destabilization of streambanks; the blockage of fish passage with a perched culvert; and the near-total obliteration of the upper portion of a small coho rearing stream caused by felling into and yarding through this wetlands area. The presence of juvenile coho was verified in an area which had been left intact 30 feet below the section of the stream which was yarded through, though downstream sedimentation had been heavy. Unit plans made available for public review in 1984 do not show streams in the vicinity of these units. Although I have not yet received the release maps requested, based on elevation contours it appears that unit boundaries were expanded after the EIS review, resulting in additional logging within the riparian zone. Again, this does not appear to be reflected in the new 1989-94 review materials.

Rock Creek (T.76S., R.85E., S. 2 and 3): A large diameter (about 6') washed-out smashed culvert was observed in the middle of stream #102-60-10370 while over-flying the area. It is not known where the washout occurred, but such incidents are indicative of our long-standing difference of opinion with the Forest Service regarding the numerous recurring problems we have with inadequate culvert designs and installations and the inevitable subsequent resource problems. In another observation on the same day, Steve Hoffman observed another culvert collapsing in the road crossing at a stream draining large lake in T.71S., R.83E., S.36. There is a very frequent occurrence of conflicts associated with culvert designs and installations. The standard reason we always receive for streams subjected to undersized culverts, the placement of culverts instead of bridges in salmon spawning habitat, and the failure to apply the correct timing criteria to fish sensitive installations, is the necessity of minimizing costs at stream crossings and expediting road construction schedules.

Cross-stream Yarding on Uncataloged Fish Habitats: The recent field trip strongly reinforced my previously unfocused general impression that logging through uncataloged fisheries habitats on Forest Service lands is a disconcertingly common occurrence.

I suspect that a thorough survey would reveal a significantly higher level of cross-stream yarding through uncataloged Forest Service fish habitats than is seen on intensively logged private properties (lands Forest Service employees sometimes point fingers at to divert public criticism). It is much cheaper to yard through uncataloged fish habitat than build additional landings and split-line streams, though through-stream yarding is one of the most damaging logging impacts to streams and their aquatic resources. Oftentimes, the cooperation we get for split-lining streams on privately-owned lands is quite good, while I seriously question that the Forest Service has an equal willingness to do this based on some unit layouts I've seen. While flying over Forest Service lands earlier this month, I observed several places in the Staney Creek, Shaheen, Thorne River, and Logjam drainage systems which seemed to have involved a significant level of cross-stream yarding in suspected uncataloged fish habitats. In fact, during the joint field trip Habitat Division staff took with the Forest Service in 1987, one of the "showcase" units we were taken to included cross-stream yarding directly through productive trout and char habitat on Steelhead Creek.

MORE EXAMPLES

In the recent past we have seen numerous encounters involving similar conflicts with fisheries habitats on Forest Service lands in southern Southeast Alaska. Some of these are briefly described in rough chronological order as follows:

Lancaster Cove: This spring the Forest Service was contractually obligated to allow installation of stream crossings outside of timing requested by their fisheries staff. Additionally, the designs approved for construction were also inadequate for the protection of fisheries habitat. Reportedly, the designs and timing were an item of considerable discussion during the prior summer, though ADF&G was never contacted during this pre-construction phase of an apparent contentious roading plan for this area. After ADF&G intervened, some design changes were implemented following a very difficult negotiation process, but construction occurred while salmon eggs were still incubating in spawning habitat. ADF&G felt other design changes were also needed, in addition to our disagreeing with timing window dates on other installations where timing was applied, though too liberally. This type of problem should be addressed by better policy-level planning so that we are not forced to deal with it each time part of the 350-400 miles of road per operating period gets constructed.

Stream Crossings at Roads: Road crossing designs on Prince of Wales were recently found which would block fish passage. At several other locations, bridge removals were scheduled to be replaced by culvert installations in spawning habitat. These are very common ongoing chronic problems which usurp much of our staff time (that is, when we find out about them).

Rush Creek: In late November or early December 1988 a massive soil failure occurred in a fresh clear-cut above Rush Creek on Forest Service lands near Thorne Bay. Prior to construction, Forest Service biologists told the District Ranger that this road and the steep-sloped units jeopardized the fish habitat below, and predicted water quality problems and mass wasting. They requested relocating the roads and units or deleting them from the area entirely. When the objecting biologists transferred to other places, the Forest Service proceeded with roading and cutting of the area as quickly as possible, in spite of the hazards to fisheries habitat. Roading and bridge construction took place outside of the normally expected timing windows, and the predicted water quality problems and mass wasting occurred within a couple of months after roading and logging. The debris torrent from this slide removed the road, and terminated on the banks of Rush Creek, located a couple of hundred feet below the road. With this soil failure (and others) heavy sedimentation into salmon spawning habitat at Rush Creek was unavoidable, and will remain a chronic problem.

East Fork Staney Creek: In November of 1988 staff became aware of a bridge replacement in coho habitat which had recently been downgraded to a culvert. Forest Service fisheries staff had requested that timing for bridge replacement at this site be from May 15 to September 1. However, the log stringer bridge was replaced with a 9-foot diameter culvert on October 4, during or following adult coho salmon returns/spawning. This required excavation of streambed materials to bed the culvert, with heavy downstream siltation a likely result.

Ward Creek: Another recent unnecessary conflict involved a "fisheries enhancement" project the Forest Service initiated in early August 1988 at Ward Creek near Ketchikan. It was the Forest Service's intent to dynamite trees and streambanks along this high-quality salmon and steelhead system to create new rearing habitats for juvenile coho. The Habitat Division of the Alaska Department of Fish and Game heard about the project from a citizen's complaint about two weeks before the scheduled blasting, and after evaluating the proposal and opposing most aspects of it, requested denial of potentially harmful aspects of the activities proposed.

It was recognized by the Alaska Department of Fish and Game that the Ward Creek system had abundant unused rearing habitats, and that insufficient rearing areas did not seem to be depressing fisheries productivities. It did not appear that increasing rearing habitats would cause population levels to rise to past escapements. Therefore, it was requested by the State's Habitat Division that the Forest Service significantly modify the intended work scope to avoid the harmful side effects of extensive blasting, which included potential mortalities to juvenile fishes and the sedimentation of Ward Creek. In spite of these requests, Forest Service personnel proceeded with most of the planned agenda, resulting sedimentation into Ward Creek and no known habitat improvement.

Asked why they chose this particular location, when virtually many hundreds of miles of damaged streamside habitat truly needing enhancement are found on Prince of Wales Island, the response of the acting District Ranger was very straight-forward and honest. He simply explained that they wanted to spend the money at a location on the Ketchikan city road system where they could take visiting dignitaries who had flown into town and were on tight time schedules. Needless to say, the project appeared to be a disaster, and it seems very doubtful that any visiting dignitaries will ever be escorted to this site so that they can be impressed.

Howling Dog Creek: A couple of years ago, while driving down the Thorne Bay road, I encountered a very large culvert (approximately 8 foot diameter) which had recently been installed in good quality coho spawning habitat at the time salmon eggs were incubating in the gravels. As a backhoe had done extensive excavation in the stream to install the culvert, it appeared that virtually all eggs in the stream had likely been suffocated with heavy deposits of silt for a distance of up to a couple of thousand feet downstream. Due to other types of chronic fisheries problems which seemed to exist since my 1984 arrival to Ketchikan, at this time I sent a letter to the Forest Supervisor requesting that we be informed of each case where, in the future: (1) timing for stream crossing installations in fish habitat was not implemented, (2) fish passage was blocked, or (3) recommendations made by Forest Service fisheries biologists conflicted with decisions ultimately made by District Rangers. Although no responses were ever received, I do not believe that "no-news-was-good-news." It was only after we stumbled into the Staney Creek and Rush Creek incidents about six months ago that we began to attempt to focus on these issues once again.

CONCLUSION

I regret that I cannot write a memo on this subject that is more positive, but conflicts such as this are only examples in a series of seemingly endless chronic problems that we have never been able to successfully address. Although a positive aspect of the Forest Service fisheries program is that they have some competent and conscientious people, this does not seem to allow the field situation associated with many logging and roadbuilding activities to progress, probably because the Forest Service field biologists have virtually no authority. Additionally, there is the problem of extremely high turn-over, and people are oftentimes gone before the two years or so it takes to learn the geography and responsibilities associated with such work.

Several memos within the past six months have addressed both general and site-specific problems. The types of practices described above are not part of a monitoring effort, but were generally encountered on an accidental basis while randomly traversing Forest Service lands. I do not believe that necessary feasible and prudent fisheries protection measures are being adequately implemented in a manner consistent with good multiple resource management principles. Based upon long-term observation and experience, the extent of these problems seem to be of a magnitude that cannot be effectively addressed at a field level. In spite of the fact that we have tried to improve policies in the past, I would like to request that staff again explore what options are available for effectively preventing the continued mistreatment of state-owned public-trust fisheries resources impacted by logging and road building activities on federal lands in Southeast Alaska.

(Attachments)

cc: Don Cornelius
Janet Hall-Schemp
Dave Hardy
Lana Shea
Glenn Freeman
Kate Troll

ATTACHMENT D

Present Net Values

C1 Channel Type

Timber Harvest Versus Coho Production

100 Year Time Horizon in 1985 Dollars

Timber	Coho
$1,251.84	$2,192.48
$1.25 /ft.	$2.19 /ft.

Joseph R. Mehrkens
Executive Director

SOUTHEAST ALASKA
NATURAL RESOURCES CENTER
130 Seward Street • Juneau, Alaska 99802 • (907) 463-5333

Buffer Strip Analysis -- Timber PNV

INPUTS

Discount Rate		4	%
Channel Type	c1		classification
Buffer Area		4.59	acres
Length		1,000	feet
Setback From Bank		100	feet
Volume Per Acre			
Old-Growth		33.98	mbf/acre
Second-Growth		50.801	mbf/acre
Total Volume			
Old-Growth		156	mbf
Second-Growth		233	mbf
Percent Area PCT		100%	
Selling Values			
Old-Growth		$251.45	1985 $/mbf
Second-Growth		$365.00	1985 $/mbf
		0.00	%
Logging Costs			
Old-Growth		$141.32	1985 $/mbf
Second-Growth		$141.32	1985 $/mbf
		0.00	%
Road Costs			
Old-Growth		$22.86	1985 $/mbf
Second-Growth		$2.29	1985 $/mbf
		0.00	%
Thinning Costs		$396.07	1985 $/ac.
Timber Sale Prep. Costs			
Old-Growth		$57.86	1985 $/mbf
Second-Growth		$15.34	1985 $/mbf
Timber Sale Admin. Costs			
Old-Growth		$13.78	1985 $/mbf
Second-Growth		$6.48	1985 $/mbf
		0.00	%

Stream of Activities, Cost and Benefits

Activity:	Timber Sale Design and Layout
Year	1
Benefit Value	$0.00
Cost	$4,513.51
Net Value	($4,513.51)
Discounted Net Value	($4,339.91)

Activity:	Timber Sale Design and Layout
Year	2
Benefit Value	0
Cost	$4,513.51
Net Value	($4,513.51)
Discounted Net Value	($4,172.99)

Activity:	Road Construction
Year	3
Benefit Value	$0.00
Cost	$3,566.50
Net Value	($3,566.50)
Discounted Net Value	($3,170.60)

Activity:	Timber Harvest
Year	4
Benefit Value	$39,229.89
Cost	$24,197.88
Net Value	$15,032.02
Discounted Net Value	$12,849.43

Activity:	PC Thinning
Year	19
Benefit Value	$0.00
Cost	$1,818.50
Net Value	($1,818.50)
Discounted Net Value	($863.14)

Activity:	Timber Sale Design and Layout
Year	98
Benefit Value	$0.00
Cost	$3,578.00
Net Value	($3,578.00)
Discounted Net Value	($76.63)

Activity:	Road Reconstruction
Year	99
Benefit Value	$0.00

Cost	$356.65
Net Value	($356.65)
Discounted Net Value	($7.34)
Activity:	Timber Harvest
Year	100
Benefit Value	$85,134.83
Cost	$32,962.34
Net Value	$52,172.49
Discounted Net Value	$1,033.02
Present Net Value	$1,251.84

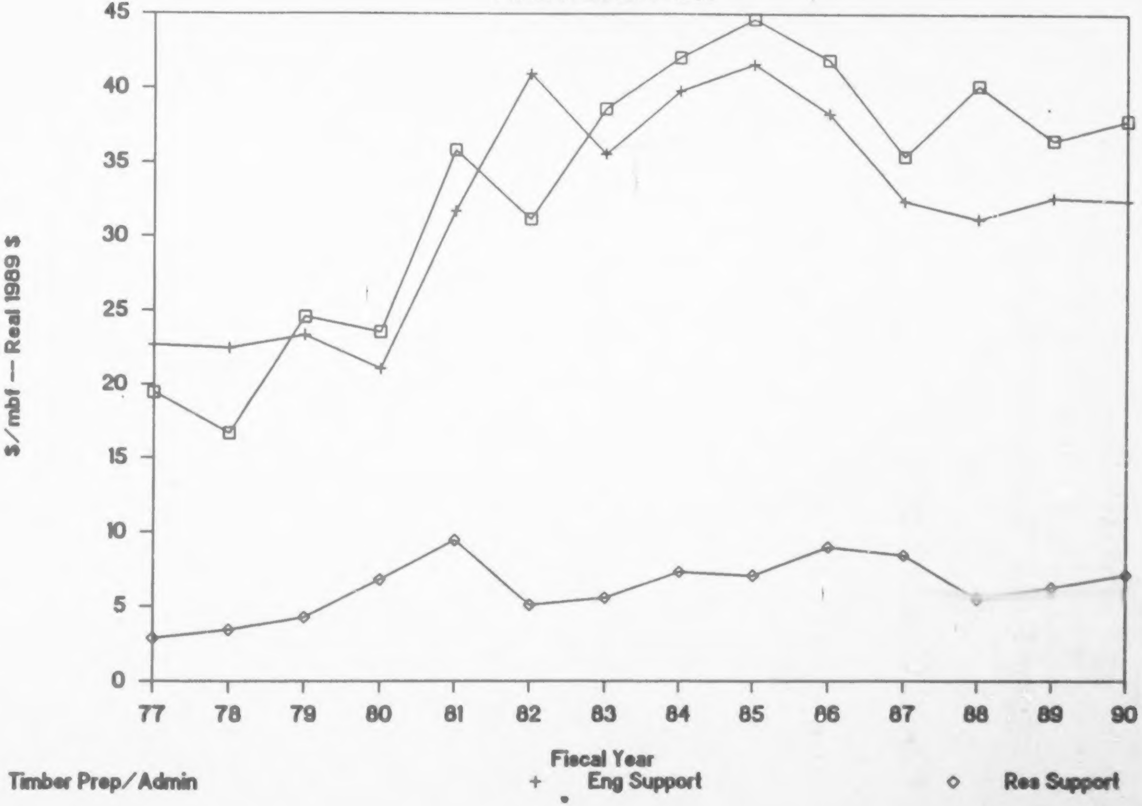
Log Prices and Unit Costs

C1 Channel Type

		Old-Growth	Second-Growth	
Pond Log Prices	in dry sale	$251.45 per mbf	$365.00 per mbf	
Timber Sale Design Costs	not budget	$57.86 per mbf	$15.34 per mbf	
Timber Sale Administration		$13.78 per mbf	$6.48 per mbf	reconstruction
Road Construction Costs	budget	61 $22.86 per mbf 13	$2.29 per mbf	con [illegible]
Logging Costs	KK E15 Timber Appraisal	$141.32 per mbf	$141.32 per mbf	
Precommercial Thinning Cost		$396.07 per acre	na	

Unit Costs -- Tongass Timber Program

Fiscal Years 1977-1990



Activity	Year
Timber Sale Design & Layout	1–2
Road Construction	3
Timber Harvest – Old Growth	4
Precommercial Thinning	19
Timber Sale Design & Layout	98
Road Reconstuction	99
Timber Harvest – 2nd Growth	100

ATTACHMENT E

UNITED FISHERMEN OF ALASKA

Kate Graham ~~Jack Cadigan~~
Executive Director
907-586-2820
1-800-478-FISH

February 21, 1988

Honorable Don Young
2331 Rayburn House Office Building
Washington, D.C. 20515

Congressman Young:

For a number of years now, the fishermen of Southeast Alaska, through their individial organisations and through the United Fishermen of Alaska (UFA), have tried to impress upon the Congress the need to approach forest management in Alaska with an eye toward the future of our state's most renewable resource, the salmon that spawn throughout the Tongass National Forest and the private holdings of our state's Native corporations. This has not been an easy task. Our call for a balanced management strategy, giving equal importance to the fisheries resource and the necessary care in stream-side management, has been assailed by some spokesmen for the timber industry as an attempt to destroy the industry and destabilize the economies of our communities. Nothing could be farther from the truth. The rhetoric has been heated, such that we are concerned that the surrounding atmosphere may not be entirely conducive to reaching a workable compromise. This has been very unfortunate. It is clear that some means of resource conflict resolution needs to be developed so that our communities can continue to diversify and prosper in an atmosphere of mutual respect.

UFA is as sincere as all of the other parties involved in bringing this atmosphere about. At the same time we remain absolutely committed to working towards a resource development ethic that recognizes the important role habitat protection plays in our industry.

UFA did not adopt a formal resolution on the Tongass Timber Reform Act at their February 1988 meeting. The main reason for this was your introduction of a compromise proposal into the debate on Tongass within the Interior Committee, and our desire to make a good faith effort to work together for the benefit of all Alaskans.

The UFA's Tongass Timber Resolution of February 1987 called for an end to the 4.5 billion board feet per decade mandated harvest level and also called for termination of the 50 year contracts. The terms of the 50 year contracts and the timber supply mandate of Section 705 of ANILCA constantly do an end-run of the standard forest planning process. From our perspective, this approach to resource management has placed legitimate users and dependents of non-timber resources in an unfair position. We have often been accused of attempting to infringe upon the rather exclusive use of public lands that a private timber entity feels has already been directly or tacitly promised to them. The U.S. Forest Service either does not have, or has not exercised to date, the flexibility to manage watersheds important to the health of our salmon resource.

These issues have been discussed at length by all parties involved and it is obvious at this time that we have two choices. We can all work together to devise a compromise appropriate to all users and dependents of our national forest system (which is what we prefer to do), or we can retreat to our respective end zones to do battle (which is exactly what we would like to avoid).

Your office has made clear your position with regard to the 50 year contracts. We still feel the U.S. Forest Service has not provided the protection we need, in their efforts to comply with their interpretation of their obligations under the contracts, but we do not wish to see the efforts of compromise halted on this point. We are ready to participate in any legitmate and conscientious efforts to find common ground that will give our resource managers the ability to protect our fisheries habitat and live within the contracts.

We have been asked to provide to the Interior Committee specific areas that deserve protection as priority fish habitat areas. Southeast Alaska has thousands of various types of streams and tributaries producing five species of salmon. We wish to point out that all of these streams are worthy of special care with regard to other resource uses. The overall approach to forest management needs to address all anadromous fish streams. The enclosed list merely identifies areas of immediate concern due to the current cutting plans.

If the placement of these areas into LUD II designations would impact the timber base too heavily, one possible approach to some of these areas would be the establishment of minimum impact zones or some other strategy that recognizes the stream-side habitat priority.

The Alaska Department of Fish and Game, at the request of the Governor's Office, has provided a list of Class I, II, and III streams to our state's office in Washington, D.C. This list may also be helpful to the Committee in identifying areas of potential resource use conflict.

We can very much appreciate the difficulties you and your Committee face in finding a workable solution to these problems. We have called for major changes in the management of the Tongass National Forest, yet we still stand ready to work constuctively with you and all parties to protect our resources and our livelihoods.

Sincerely,

Jim Bacon
Jim Bacon
President, United Fishermen of Alaska

cc: Honorable Ted Stevens
Honorable Frank Murkowski

The following areas are in the Ketchikan District:

VCU	AREA	CURRENT DESIGNATION
550	Warm Chuck (2nd growth)	LUD IV
541	Shipley Bay Head	LUD IV
606	Upper Karta	LUD I Released
605	North Karta	LUD I Released
607	South Karta	LUD I Released
608	South Karta	LUD I Released
682	Atkin Cove/Millar Lake	LUD IV (some native land)
683	Kegan Cove	LUD IV
684	Northwest Moira	LUD II
686	Nutkwa	LUD IV
685	Southside Nutkwa	LUD IV
742	Naha - Hedlman Lake, Jordan Lake	
534	Salmon Bay (North P.O.W.)	LUD III
719	Stewart Creek	LUD IV
678	Disappearance Creek	LUD IV
720 & 718	Head of Vixen Inlet	LUD IV

There are other areas of concern in the Ketchikan District such as Helm Bay, Short Bay, and Traitors Cove. We cannot over-emphasize the importance of forest-wide fish habitat management.

The following areas are in the Stikine Ranger District:

VCU#	AREA	CURRENT DESIGNATION
469	Snake Creek/Olive Cove	LUD IV
483	Dry Bay	LUD IV
409	Bear Harbor (S. Kuiu)	LUD III
418	Seclusion Harbor(S. Kuiu)	LUD IV

The following areas are in the Chatham Ranger District:

VCU#	AREA	CURRENT DESIGNATION
236	Kadishan	LUD III
249,250,262	Lisianski	LUD IV
247,248	Upper Hoonah (Broad River, Finger Creek, Ole Creek)	LUD IV
280	Deep Bay	LUD IV
244	Sitkoh Bay* (Sitkoh Lakd Creek)	LUD IV
281	Ushk Bay (King crab habitat)	LUD IV
296	Lake Eva	LUD II
314	Kelp Bay (Clear River)	LUD IV
71, 76	Chuck River	LUD III & LUD IV
24,23,25	Berners Bay	LUD III

* Already cutting, asking for minimum impact

The fishermen of Yakatat have asked the the Yakatat Forelands, the Italio, Akwe, and Ustay Rivers be granted protection. I am sure when other fishermen see this list they will find some places missing.

ATTACHMENT F

UNITED FISHERMEN OF ALASKA

211 4th Street, Suite 105
Juneau, AK 99801
907-586-2820

January 30, 1990

Board of Directors
Southeast Conference
P.O. Box 22286
Juneau, Alaska 99802

Dear Board Members:

On behalf of our Southeast Alaska member organizations, listed below, we are responding to the proposal put forth at your January 23rd meeting that requested you to change a portion of your position on ANILCA amendments regarding the Tongass National Forest. Commercial fishermen in Southeast are gravely concerned about several aspects of this proposal and the situation surrounding it.

It appears that you have not been presented with enough information to make a well-informed decision, and it is unfortunate that this short comment period will not really allow us to remedy that situation. We can only give you brief examples of the gaps in the proposal you are considering. During your meeting commercial fishing was mentioned only once or twice, yet ours is the largest private industry in Southeast. Here we accounted for almost 12,000 jobs in 1986 just in the harvesting sector, and fishermen earned more than $109,000,000 that year. The estimates for 1988 and 1989 for Southeast salmon fishermen approach $125,000,000. Commercial salmon fisheries rely on thousands of large and small stream systems in Southeast to provide this harvest value. For example, the Lisianski River system alone accounts for a harvest of more than $1,000,000 each year. Yet in the explanation you received of proposed changes to the Lisianski area there was no mention of commercial fishing. Although you were told that "much of the area . . . does not have any unique or special features," the fact is that it is one of the top five salmon producers in the region. A similar example is the Chuck River which also supports an annual harvest of $1,000,000. Yet once again the explanation you were given doesn't even hint that there are commercial fisheries values that could be impaired by timber harvest.

You are being asked to make major changes to your position in the name of clarification, and you are being asked to do so in a hasty fashion. Your original position was respected because it was arrived at in a deliberate manner after consultation with most of the affected interests and residents. The same cannot be said for the action you are now contemplating. You can see in the two examples above that you don't have the full picture before you. The commercial fishing industry provides more direct jobs than any enterprise other than government, yet even our elected officials sometimes forget that fish as well as trees grow in the Tongass.

All of this illustrates another concern of ours - that you might be jeopardizing the standing you attained as a result of the process by which your original position was reached. The process you followed at that time is almost irreproachable, and it achieved for the Conference widespread support and goodwill, although the position itself is not wholly satisfactory to any of the affected industries. It is entirely appropriate for you to stand by your original decision; changes to that decision are not necessary when you are merely being asked to clarify your position. As John Katz and Craig Lindh reminded you at your meeting, your efforts to serve as a conduit for the attitudes of all Southeast residents are what gave your position credibility with both Governor Cowper and the U. S. Congress, who then felt comfortable in using your position as a starting point in negotiations. This credibility has given Southeast residents a voice in Congress that we would not otherwise have had and the Southeast fishing organizations urge you not to risk losing it.

Another aspect of great importance to us is the inconsistency you showed at your meeting when discussing the proposed changes to your position. Several of you mentioned being willing to consider changes to protected areas because you thought buffer strips would protect the fish streams. The Southeast Conference position, however, does not mention buffer strips and, in fact, Congress has not yet resolved that issue. It is important that you realize that buffer strips are not a substitute for overall watershed protection, because in areas with unstable soil, for instance, buffer strips are not enough to prevent ultimate damage to fish habitat. A cursory review of the maps tells us that the integrity of the watersheds, slope stability and upland water quality have not been accounted for in the proposed alterations. It is incumbent on you, if you are representing the views of all Southeast residents, to emphasize to Congress the need to maintain protection for our one truly renewable resource. If despite a lack of adequate information, you decide to make changes to your maps, you must include a strongly worded statement insisting on the need for buffer strips throughout Class I and II and important Class III stream systems. This is necessary because your original position included protection for some of those systems in the set-aside areas; the proposal you are now considering does not.

Commercial fishermen would like very much to be a part of a process that works toward a solution that will benefit all Southeast residents. We object, however, to simply reacting to a proposal such as this: one that affects the fishing interests most directly yet omits fishery information and concerns. The extremely short time period does not allow you to gather the information necessary to make a decision of this importance. We therefore urge you to maintain your current position at this time.

Alaska Longline Fisherman's Association
Alaska Trollers Association
Northern Southeast Regional Aquaculture Association
Petersburg Vessel Owners Association
Seafood Producers Cooperative
Southeast Alaska Seiners
Southern Southeast Regional Aquaculture Association
United Southeast Alaska Gillnetters

The **Chairman**. Thank you very much, Ms. Troll.

Finally, Joseph Wilson representing Goldbelt.

STATEMENT OF JOSEPH G. WILSON, PRESIDENT, GOLDBELT, INC., ACCOMPANIED BY JOSEPHINE ARMSTRONG, CHAIRMAN, BOARD OF DIRECTORS

Mr. **Wilson**. Thank you, Mr. Chairman, Senators.

I am Joe Wilson, President and Chief Executive Officer of Goldbelt, Incorporated, the urban Native corporation for Alaska's State Capital, Juneau. I am accompanied today by Josephine Armstrong, Chairman of the Board of Directors. Both Josephine and I are also Goldbelt shareholders.

Goldbelt is one of the four urban Native corporations created under the Alaska Native Claims Settlement Act of 1971. Based on the number of shareholders, we are the eleventh largest Native corporation in Alaska.

Unlike the approximately 200 ANCSA regional village corporations, Goldbelt received no cash distributions from $1 billion Alaska Native Fund. We did receive the right to select timber lands within the Tongass National Forest in settlement for the aboriginal claims of our more than 2,700 Alaska Native shareholders.

In 1974 Goldbelt selected highly valuable timber lands on Admiralty Island near the selections of the other Native corporations with whom we planned to share costs and facilities for timber harvesting.

After several years of controversy and litigation with the Sierra Club and other environmental groups who opposed our Congressionally mandated Native land selections on Admiralty Island, in 1979 we gave up our Admiralty Island land selections for timber lands around Hobart Bay, a remote area about 80 miles south of Juneau.

Our selection at Hobart Bay in lieu of Admiralty Island was made after years of negotiations with the Sierra Club and other environmental groups. They knew our desperate financial plight.

When we finally made our peace with these groups, none of them had expressed interest in Hobart Bay or any of the U.S. Forest Service lands surrounding Hobart Bay either in the Chuck River or the Port Houghton-Sanborn Canal areas.

Our selection at Hobart Bay in lieu of Admiralty Island caused Goldbelt to forego substantially better timber, which was only partially offset by 7,000 additional acres. Also important to Goldbelt was the ability to spread the enormously expensive infrastructure costs of a remote timber operation over the five planned U.S. Forest Service sales anticipated; that if we built a permanent type of infrastructure at Hobart Bay, Goldbelt would be in a good position to bid for the timber.

However, if Goldbelt was not a successful bidder, our docks, school, housing, sewer and water, underground utilities, and road system would be leased to the successful bidder for years to come, providing at least a return of Goldbelt's investment for having been forced to move off Admiralty Island.

While we were shocked at the devastating effect that H.R. 987 would have on Goldbelt, we were grateful that the Southeast Conference, when learning of Goldbelt's plight, reopened its doors and took additional testimony. After all the views had been considered, the Southeast Conference did what they initially told me they would never do:

They changed their minds and voted to permit planned timber sales and harvesting along the Chuck River. The conference, which is made up of most of the municipalities in southeast Alaska, is not known for knuckling under to the demands of the timber companies, let alone a Native corporation.

Their agreement to change their mind is reflective of the equity of Goldbelt's position and of their sensitivity to the plight of the more than 200 people who live and work at Hobart Bay.

After we had borrowed and invested $17 million at Hobart Bay, timber prices plunged. We did not meet our debt service and nearly went bankrupt. What Goldbelt created at Hobart Bay for this $17 million were sort yards, over 100 miles of roads and bridges, a deep water loading dock, and the Town of Hobart Bay itself.

Although not incorporated, the Town of Hobart Bay, with its over 200 residents, is one of the largest towns in southeast Alaska. Hobart Bay is a settlement with housing, underground utilities, sewage treatment plant, telephone service, a post office with its own zip code, a school grades K through 12, a cable television system, and three flights per day scheduled float plane service.

We believe we are being treated unfairly, because we thought we had made our peace with the conservationist groups. If these two wilderness areas are legislated, our substantial investment at Hobart Bay will become virtually worthless, part of our ANCSA settlement nullified, and the Town of Hobart Bay abandoned.

Goldbelt's $17 million investment at Hobart Bay was designed to access the timber at Chuck River. This design was encouraged by the U.S. Forest Service, which had entered into $4 million worth of cost-sharing road arrangements clearly directed at developing timber at Chuck River. The Forest Service also traded Goldbelt lands so as to provide Goldbelt better access to the Chuck River timber area.

If H.R. 987 becomes law, the investment of the U.S. government in Goldbelt will be devastated.

It has been pointed out that the Chuck River is an important spawning area for pink salmon. Goldbelt is sensitive to the importance of southeast Alaska's fisheries. Many of our own shareholders are commercial and sport fishermen.

We have for the past three years been logging along the Chuck River. There is no evidence that salmon runs have decreased at Chuck River. They have increased. We have left buffer strips along the Chuck River. Some strips have exceeded the requirements of the Alaska Forest Practice Act.

Alaska's Department of Fish and Game has recognized and praised these measures.

I would also like to point out that there are two other significant salmon streams at Hobart Bay where we have been logging since the early 1980's. Alaska Department of Fish and Game surveys of these streams show the same annual trends and variations in pink salmon escapement as on the Chuck River. Again, there are no indications our logging activity has had any adverse impact on any salmon streams.

Mr. Chairman, Goldbelt believes it has paid its environmental dues and strongly opposes the treatment it would receive under the House Bill. We ask that the proposed Chuck River and Port Houghton-Sanborn Canal wilderness areas be eliminated or redefined so that the viability of the five Forest Service sale areas and our $17 million investment at Hobart Bay are not destroyed.

We ask that the revised recommendations of the Southeast Conference be accepted. Finally, we ask that Goldbelt be permitted to live in peace without legislative and judicial harassment.

The shareholders of Goldbelt voted to accept the ANCSA settlement. Then we were sued off of Admiralty Island by the Sierra Club. We accepted ANCSA lands in remote Hobart Bay next to government-planned timber sales. Now the same groups that denied our ANCSA lands on Admiralty Island desire to deny us a benefit of the last deal made with them.

For the reasons explained in our written statement, we would also ask that the status of the proposed Berners Bay wilderness area be changed.

I thank the chairman and the committee for the opportunity to testify and would be happy to answer any questions.

[The prepared statement of Mr. Wilson follows:]

STATEMENT OF
JOSEPH G. WILSON
PRESIDENT
GOLDBELT, INCORPORATED

BEFORE THE
SENATE ENERGY AND NATURAL RESOURCES COMMITTEE
SUBCOMMITTEE ON PUBLIC LANDS, NATIONAL PARKS AND FORESTS

FEBRUARY 26, 1990

Good afternoon Mr. Chairman. I am Joe Wilson, President and Chief Executive Officer of Goldbelt, Incorporated, the urban Native Corporation for Juneau, Alaska. I am accompanied today by Josephine Armstrong, Chairman of our Board of Directors. Both Josephine and I are shareholders as well as officers of Goldbelt. We appreciate the opportunity to appear before the Subcommittee to present Goldbelt's views on H.R. 987, which designates vast new wilderness areas in the Tongass National Forest.

Before I discuss the House bill and its effects upon us, I would like to tell you a little bit about Goldbelt and its history. Goldbelt is one of the four urban Native Corporations created under the Alaska Native Claims Settlement Act of 1971 ("ANCSA"). Most of our 2,700 Tlingit and Haida shareholders reside in Juneau and other parts of Alaska, as well as Oregon and Washington. Based on our number of shareholders we are the eleventh largest of all of the Native Corporations in Alaska created under ANCSA.

Unlike the more than 200 regional and village Native Corporations originally created under ANCSA, Goldbelt received no cash distributions from the Alaska Native Fund. We did receive the right to select timberlands from within the Tongass National Forest in settlement of the aboriginal claims of our shareholders.

In 1974 Goldbelt selected highly productive timberlands on the west coast of Admiralty Island, adjacent to the land selections of three other Native Corporations with whom Goldbelt planned to cooperate in sharing the substantial costs for the infrastructure necessary to harvest timber. This initial selection resulted in several years of controversy and litigation, including with the Sierra Club and other conservationist groups who objected to timber activities on Admiralty Island.

Exhausted by this continuing controversy and with no funds to pursue further litigation, we gave up our Admiralty Island land selection in 1979. In exchange we received the surface rights to timberlands around Hobart Bay, a remote area about 80 miles south of Juneau where the conservationists had expressed no interest.

Our re-selection at Hobart Bay required us to fund the cost of developing the infrastructure necessary to support our timber operations without any cooperative arrangements with any other ANCSA corporation. Nonetheless, we believed there were certain advantages:

(1) Goldbelt would make peace with the conservationists and avoid years of costly litigation by moving off Admiralty Island and on to lands at remote Hobart Bay; and

(2) Goldbelt could use its infrastructure at Hobart Bay in connection with five planned U.S. Forest Service timber sales adjacent to Goldbelt lands, including Chuck River.

The planned timber sales by the U.S. Forest Service on lands adjacent to Goldbelt's at Hobart Bay were one of the main reasons that Goldbelt was willing to give up the benefit of such cost-sharing arrangements elsewhere. These timber sales are a part of the independent sales program reserved for small companies such as Goldbelt, and not part of the long-term contracts to supply the pulpmills.

We were shocked and distressed to discover last summer that among the 1.8 million acres of additional wilderness proposed for the Tongass by the House bill are two areas, designated the Chuck River and the Port Houghton-Sanborn Canal Wilderness Areas. These two proposed wilderness areas would virtually encapsulate our Hobart Bay property and drastically effect the economic viability of logging the nearby Forest Service timber sales which Goldbelt had counted on in trading Admiralty Island lands for Hobart Bay.

We believe we are being treated unfairly because we thought we had earlier made our peace with the conservationist groups when we abandoned our original Admiralty Island selection and because these two wilderness areas, if allowed to stand, will cause our substantial investment at Hobart Bay to become virtually worthless when logging on our Hobart Bay lands ends in a couple of years.

Our investment at Hobart Bay is about $17 million. After we finally obtained title to Hobart Bay in 1979, we invested borrowed money to create the infrastructure necessary to support logging activity, including sort yards, over 100 miles of roads and bridges, a deep water loading dock, and the town of Hobart Bay. Although not incorporated, the town of Hobart Bay with its over 200 residents is one of the ten largest towns in Southeast Alaska. Hobart Bay is a settlement in every sense of the word with housing, underground utilities, sewage treatment plant, local and long distance telephone service, a post office with its own zip code, a school (grades K through 12), a cable television system, and three flights per day scheduled float plane service.

After we had invested borrowed funds in the infrastructure at Hobart Bay, timber prices dropped precipitously. For the first five years we could barely meet our debt service and almost went bankrupt. Goldbelt has worked through these difficulties, and is now a debt-free and solvent corporation. However, the establishment of these additional wilderness areas once again poses a threat to our economic future.

Mr. Chairman, Goldbelt believes it has paid its environmental dues and strongly opposes the treatment it would receive under the House bill. We ask that the proposed Chuck River and Port Houghton-Sanborn Canal Wilderness Areas be eliminated or redefined so that the viability of the five Forest Service sale areas and our $17 million investment in Hobart Bay are not destroyed.

It is argued that the Chuck River is a "million dollar" fishery. It is certainly an important spawning area for pink salmon, which are the predominant salmon species in this area.

The Chuck River drainage, and the proposed Forest Service sale within it, is also important to us, or anyone else who successfully bids on these sale areas. The values and volumes of timber in the Chuck River drainage are significant because of the topography and road system connections. It is the proximity of the proposed Chuck River timber sale which is critical to the overall development of the other surrounding sale areas.

Goldbelt is not unmindful of the importance of Southeast Alaska's salmon fisheries. Many of our own shareholders are commercial and sport fishermen. We have for the past two years been logging on our own lands along a two-mile stretch of the Chuck River. We are leaving buffer strips along the Chuck River which exceed the requirements of Alaska's Forest Practices Act.

Also, in order to minimize any disturbance of the Chuck River, we have avoided bridging the Chuck River and are yarding logs over a half mile using an expensive aerial cable system. The Alaska Department of Fish and Game has recognized and praised these voluntary fishery protection measures.

I would also like to point out that Goldbelt has two significant salmon streams on our own Hobart Bay property where we have been logging since the early 1980's. Alaska Department of Fish and Game surveys of these streams show the same annual trends and variations in pink salmon escapements as on the Chuck River. There are no indications our logging activity has had any impact on these two salmon streams.

In closing, Mr. Chairman, let me emphasize that no one should be under any illusions about the restrictive impact of wilderness areas near privately-owned lands. Goldbelt owns a small tract of land at Echo Cove about 40 miles north of Juneau. A four-mile strip of its property would be abutted by the Berners Bay Wilderness Area also proposed in the House bill. Until last summer we had been in negotiations with a mining company to create a transportation corridor and other developments on our property in support of the Kensington mine reopening across Berners Bay from Echo Cove. When the mining company became aware of the proposed Berners Bay Wilderness Area, it terminated negotiations with us. It knows full well, as we do, that any proposed development in proximity to a wilderness area would result in years of hassle and expensive litigation, and thereby threaten the mine's viability.

In summary, Mr. Chairman, we believe we have given enough to the conservationists who would like to destroy the economic interests in our land and investments. We request that the Chuck River and Port Houghton-Sanborn Canal Wilderness Areas proposed in the House bill be withdrawn and that the status of the proposed Berners Bay Wilderness Area be changed.

I thank the Chairman and members of the Committee for the opportunity to testify and we would be happy to answer any questions.

The CHAIRMAN. Thank you very much, Mr. Chairman.

Mr. Lindh, the Forest Service's recently released analysis of the management situation suggests that as long as minimum management standards are met, the level of timber harvest does not impact fisheries. Do you agree with that conclusion?

Mr. LINDH. I understand how they arrive at that conclusion. Maybe I better let Mr. Anderson respond to that.

I think it can be said that there have been some recent problems identified. Last summer the state biologist visited some active timber sales on Prince of Wales Island and found that some of the buffer strips and some of the leave areas, wildlife retention areas, had been entered. I am not sure if it was always with the concurrence of the Forest Service.

The CHAIRMAN. Dr. Anderson is?

Mr. LINDH. He is with the Department of Fish and Game. He is the Regional Supervisor for the Division of Wildlife Conservation.

The CHAIRMAN. Would you answer that question briefly, please.

Dr. ANDERSON. Yes. Thank you, Mr. Chairman.

As Craig pointed out, I am supervising all wildlife research and management in southeast Alaska, which is basically synonymous with the Tongass.

In response directly to your question, it appears not only in the 60-page pre-AMS, but based on our relatively cursory review of the technical AMS as well, fisheries outputs appear to be constant at about 130 million pounds, I believe, annually across all 24 benchmarks.

My understanding of how that was arrived at, although the assumptions underlying that process are not spelled out in the 60-page document, we were told by the inter-disciplinary plan revision team the assumption underlying those outputs——

The CHAIRMAN. Just tell me, do you agree or disagree with the statement?

Dr. ANDERSON. We would have to agree with it based on the assumption, if the assumption had been made clear, which is that all conceivable fisheries enhancement projects would be carried out by the Forest Service in order to maintain those outputs at those levels.

The CHAIRMAN. Well, are you suggesting that the Forest Service should have discretion as to how to manage the buffer zones, or that those should be spelled out in the legislation?

Dr. ANDERSON. I think that I would not favor Forest Service discretion on that point. One of the primary reasons I think that has been alluded to previously and is documented in internal memoranda and also external memoranda from our Commissioner, on a field trip that was conducted by our habitat division on Prince of Wales Island within the last year, it revealed a number of cases where there were very obvious violations of existing policies or regulations relative to that issue.

The CHAIRMAN. So let me see if I can get this. In effect, you are saying that, yes, if minimum management standards are met, that fisheries would not be impacted, but that in effect the Forest Service is not following their minimum management standards and therefore we should spell out, at least with respect to buffer zones, a specific zone so as to take that discretion away from the Forest Service?

Dr. ANDERSON. Yes, I would strongly support that. I think just as a matter of logistics and funding, the Alaska Department of Fish and Game Habitat Division certainly does not have the funding or the manpower to investigate and enforce those things.

I seriously doubt whether the Forest Service does, either.

The CHAIRMAN. That is the position of the State of Alaska, Mr. Lindh?

Mr. LINDH. I would say so. Outside of the buffer zones which we have talked about here at some length, the Forest Service still will exercise considerable discretion. They have spoken about in some cases under current practices providing up to 500 feet of streamside protection.

The CHAIRMAN. All right. I do not want a long answer.

Mr. LINDH. Okay.

The CHAIRMAN. Just that is the position of the State of Alaska.

Mr. Finney, could you tell me briefly, why do you think the Forest Service's credibility is apparently low here, with the fishermen?

Mr. FINNEY. Well, Mr. Chairman, I would say that the people that we hear stating that the credibility is low are fish biologists, who look at one thing and that is fish biology.

The Forest Service unfortunately has to look at all of the other resources, including timber and wildlife, recreation and so forth. So I think that probably is the answer to that question.

The CHAIRMAN. Okay. Now, Mr. Finney, if you can tell me, if you know, we have been harvesting in Alaska about 320 to 450 million board-feet a year. I think lately it has been in the high 300's, is that correct?

Mr. FINNEY. Yes, sir. I think this last year it was in excess of 400.

The CHAIRMAN. Okay. Now, under the House bill in your view, assuming market conditions are okay, how much could you harvest, do you know?

Mr. FINNEY. Well, under the present ANILCA legislation, 450 million feet average is the limitation.

The CHAIRMAN. I am talking about the House bill.

Mr. FINNEY. Under the House bill?

The CHAIRMAN. Yes, H.R. 987?

Mr. FINNEY. Yes, I know the bill. And your question was how much could we harvest if that were law?

The CHAIRMAN. Yes.

Mr. FINNEY. Well, there is so much variance in the interpretation. I have heard here today that now they are not talking about all of Class III streams. Originally we heard all of Class III streams and most of Class II and all of Class I were going to have buffer strips, and so forth.

So it varies when people change their testimony on what is going to happen.

The CHAIRMAN. Well, let us say you have the House bill. It is rather vague in the House bill on buffer zones, but let us say you defined it as being 100 feet with no selective harvesting on Class I's, that you have got 100 feet on those Class II's that drain into the Class I's. Otherwise it would be best management practices. And Class III would use best management practices.

Mr. FINNEY. I guess, and I would like to be able to give you this in more detail, the answer to this question in more detail. But just off the top of my head right now, we have kind of said that if the worst case happened under that legislation, we would probably have a reduction of over 50 percent of our industry.

So it would be somewhere around 225, 230 million. Whereas the best case interpretation of that would probably leave us somewhere around 300 million.

The CHAIRMAN. All right. Under Southeast Alaska 1, can you give me a judgment on how much could be harvested?

Mr. FINNEY. Again, there are a lot of varying answers to that, and I would very much like to give you that in writing when we have a better chance to look at it.

The CHAIRMAN. By the way, I would solicit each witness who would like to make an estimate to make an estimate of these things: How many board-feet can be harvested under the various scenarios.

Mr. FINNEY. I might add, Mr. Chairman, under the Southeast Conference position, too, that it anticipates an expenditure of $15 million a year for intensive forest management, both number 1 and number 2. That in itself has a large bearing on how much timber would be produced, if that money would be available.

So no matter how you state it, there is going to be a "what if" involved with it.

The CHAIRMAN. Mr. Lindh.

Mr. LINDH. Yes. Regarding the original Southeast Conference proposal, the conference estimated about a 23 million board-foot per year impact on the 450. I recalculated the numbers using the Forest Service data base and came up with about 28 million of the 450. That would be the effect of that version that the State is supporting.

Mr. FINNEY. If they have the $15 million?

Mr. LINDH. That is correct, that the intensive management fund, which would be an annual appropriation, would in the future produce increased growth on young timber stands that would be thinned when they are young.

The CHAIRMAN. Well, that is a little less than what is being produced now? I mean, a little more than what is being produced now. You are saying the Southeast Alaska 1 would impact about 28 million board-feet, would decrease it 28 million from the 450 base.

Mr. LINDH. That is our calculation.

The CHAIRMAN. That would be about what is being produced now.

Mr. LINDH. That is pretty close.

The CHAIRMAN. Is that right?

Mr. FINNEY. Yes, that is true. You have to take into consideration that what is being produced now is also a large amount of Native logging that is providing a pulp component to what is being used on the forest. They have reached the peak.

I think totally the industry in southeast Alaska produced somewhere around a billion board-feet of timber this year, the largest amount they ever have. That is going to start down because the

Native timber is starting to run out, and we will need more of the Forest Service timber to keep any part of those jobs.

The CHAIRMAN. Now, would that say that Southeast Alaska 1, if implemented, could preserve these some 3500 jobs? Do you understand the question?

Mr. LINDH. Are you asking him or are you asking me?

The CHAIRMAN. Both of you.

Mr. FINNEY. Again, you have got the "what-if's." If the $15 million is available and if we are allowed to cut that amount, there will still be a drop in the jobs in southeast Alaska as the Native timber phases out, a fairly large drop.

The CHAIRMAN. Over what period of time would be that drop in jobs, and how much drop?

Mr. FINNEY. How much drop? Well again, if we produced a billion board-feet this year and only 400 or 420 of it came off the national forests, it is the jobs associated with somewhere around 600 million board-feet. Those are mostly logging jobs because they do not—they export the logs.

But they do support, those jobs—50 percent of that material is pulp and it is going into the pulp component now for those two pulp mills. And it will have to be replaced when the Native timber is no longer available.

The CHAIRMAN. Mr. Lindh?

Mr. LINDH. I would like to comment also, that when the Governor testified last spring regarding the possible effects of the 28 million board-foot reduction, it was felt that the effect would be mostly felt in terms of new jobs created as the market conditions came back up and more people would go to work.

The markets were way down and employment was about half of the 1980 figure back in 1985. The timber industry was in its worst condition that it has been certainly since I have lived in Alaska.

So it was really our feeling that the effect would be more on growth in employment in the portion of the industry that cuts national forest timber.

Mr. Finney's comments about Native timber. There are various estimates of how fast that will go. It depends on corporate decisions and it could be ten years, it could be less than that. But certainly those corporations can——

The CHAIRMAN. Is that a fair statement, do you think, Mr. Finney?

Mr. FINNEY. Well, no. Some of them have already cut out their timber and are starting to see a decrease, and it will decrease at a decreasing rate no matter what their corporate decisions are. They only have a fixed amount of timber to operate.

They may stretch it out over a ten-year period, but it will be a lot less available.

The CHAIRMAN. Let me say from my standpoint that jobs are not the only consideration here. They do not necessarily dictate the terms of the bill. But on the other hand, we would be very foolish, I think, not to know the impact of the legislation that we pass on jobs.

So for the purpose of going to markup, I would solicit all witnesses to further elucidate, if you would like to, in writing on the effect of various formulations.

Now, with respect to buffer zones, I think frankly it is fairly well agreed that you will have a 100-foot buffer zone on Class I streams. There might be a little argument and I do not ask for anyone to approve that, but I think a 100-foot buffer on Class I is here.

I think you can assume no selective harvest in Class I, although we will argue about that. It certainly has not been agreed to.

And on Class II's, you could assume that you protect with 100 foot buffers only those that flow into Class I's, and otherwise for other Class II's as well as Class III's you have Forest Service management.

Then I would like to know what the effect on jobs and harvest levels are of Southeast 1, Southeast 2, the House bill, or any other formulation which you would like to make, because we cannot be unaware of the effect on jobs of the things we do here.

Mr. Metcalf, you seem to be a little more bullish. I think you said that with the House language you would have 390 million board-feet?

Mr. METCALF. That is correct.

The CHAIRMAN. So that if you go to the Southeast 1, there would be, I take it, in your opinion even more board-feet?

Mr. METCALF. I would agree with the State, it is probably around 422 or so.

The CHAIRMAN. Under Southeast 1?

Mr. METCALF. Yes.

The CHAIRMAN. And what would be the effect on jobs?

Mr. METCALF. There would be no effect on those jobs dependent on Tongass timber at this point. There might, obviously, in the future be some decrease as the industry would not grow way beyond where they are now.

The CHAIRMAN. Mr. Griffin has said Southeast 2 is the best formulation, but the Governor is for Southeast 1, and your view is that Southeast 1 best represents the consensus of Alaskans?

Mr. LINDH. I think that it is correct to say that it best represents—it is as close as you are going to get to a compromise among the people that live in southeast Alaska.

The CHAIRMAN. Okay. Let me ask others to speak to that.

And again, we are not just a public opinion poll here, but I would like to know what the people of Alaska also feel.

Mr. Griffin?

Mr. GRIFFIN. Thank you, Mr. Chairman.

I happen to disagree with Mr. Lindh. In our analysis, the indication is that there were a number of people left out of the original proposal's review, that there have been a number of changes as far as testimony before the House is concerned from people within southeast Alaska who were not included in the original document and information that was forwarded to you.

I am sorry you have not gotten it, but I will make sure that you do by tomorrow.

The CHAIRMAN. So it is really a change in the composition of the Southeast Conference, rather than a change of opinion of those who originally came up with Southeast 1 that causes the change?

Mr. GRIFFIN. Nine of the original eleven members of the board of directors of Southeast Conference are still board of director members, who voted on number 1.

The CHAIRMAN. Did they change their opinion?

Mr. GRIFFIN. Yes, several.

The CHAIRMAN. Of the nine, how many did, and do you know why they did?

Mr. GRIFFIN. There were many factors that contributed to their change. One, of course, was the fact that new information came before them.

Two was that information included such things as maps. Prior to the vote on number 1, there were no maps provided to the board of directors and they were not able to see what the results of their actions might be. VCU numbers and other kinds of descriptions were given to them, but they saw no maps.

When they saw the maps, as you have had an opportunity to take a look at portions of them today, they began to think about not just the timber industry and not just the fishing industry, but all the other industries and people who live in Southeast Alaska.

We have to look for transportation corridors for 10, 20, 30 years down the road. We have to look for utility corridors 10, 20, 30 years down the road.

The Southeast Conference is on record supporting the Southeast Intertie, which is an electrical intertie for Southeast Alaska, which is going to need utility corridors, and you do not run them across wilderness areas.

We also are on record of supporting the Marine Highway System and other highway systems in Southeast Alaska to provide transportation. You do not do that across the wilderness area.

I can go on and on and on as to why some of the people who changed their minds on the board did so.

The CHAIRMAN. Mr. Metcalf.

Mr. METCALF. Yes, I think I would like to speak to that also.

I think, while the Southeast Conference 1 was a good proposal, it did not go as far as we would like. But it was an honest proposal that took a lot of time to craft. And Southeast 2 simply did not take that time. It left a lot of people out.

While we say, yes, it included more people, in fact the record shows clearly that there were a lot of people very upset about Southeast 2. They were concerned perhaps not with the content of the proposal, but with the way it was done.

Take for instance Sitka, a strong supporter of the timber industry, simply said that they were not willing to support the Southeast 2 because they did not like the way it had been done, and at the last borough meeting that I listened to said that they were not going to support it. They were going to wait and see.

So I think you have to look at not only the content of it, but also the way it was engineered.

The CHAIRMAN. Ms. Troll.

Ms. TROLL. Yes. I believe that the revised Southeast Conference came about as a change of board representation at the last Southeast Conference board meeting, where some membership were changed and some of the people involved in the Tongass timber legislation no longer serve on the Southeast Conference board of directors.

In some of the documentation that was provided to the current Southeast Conference when they were considering this revision, it included a letter from a timber company that said: "It is our understanding that the revisions to these areas were in large part the result of a coordinated effort put forth by the Alaska Loggers Association."

That is certainly the understanding that the fishing associations had when we looked at the proposal. We noticed a surprising similarity.

I would also like to point out that the past Executive Director of the Southeast Conference, Mr. Jim Ayers, adamantly opposed this rushed revision because it deviated dramatically from the open deliberative process that was conducted earlier.

The CHAIRMAN. Let me interrupt to ask an important question, because I do not want to hog all the time here. Let me just ask one more question of you, Ms. Troll. What interest do the fishermen have beyond adequate buffer zones?

Ms. TROLL. We have an interest in multiple use management of the Tongass National Forest. When one use, such as timber, has a Congressional mandate, we feel it kind of tips the scale a little bit.

We would like to see the long-term contracts renegotiated. We do not favor cancellation. But when you have——

The CHAIRMAN. But I mean, is that in your capacity as a resident of Alaska or as a fisherman?

Ms. TROLL. Both.

The CHAIRMAN. In other words, really the question is, if you protect the buffer zones, why is timbering bad? How does it affect the fisheries?

Ms. TROLL. Well, we feel that buffers are essential for areas that will be logged and, as I stated in my testimony, we also feel that there are certain areas where the fisheries production is so high and so valuable that that in itself merits it to be retained in its natural state, that the watershed should be retained.

We do not feel that our position is anti-logging, that logging is bad. What we are trying to get is the prudent management.

The CHAIRMAN. Well, I know, but in effect you are saying that a 100-foot buffer is not enough? Or if you have a 100-foot buffer and Class II's that go into the Class I's and they are all protected, why does logging affect the fishery, or how does it affect it?

Ms. TROLL. Okay. For those areas that will be logged with that type of protection, we feel that almost all of the logging impacts would be appropriate mitigated, okay. Now, in areas such as some of these important set-aside areas, the Katashan, the Chuck River for example, you would also have road building that would be associated with any activity outside of the buffer, and road construction and building have also impacts on fish habitat.

Once you have a road in there, then you have to justify the economics of keeping that road, which we have seen happen time and time again: Well, we start logging in more and more areas.

So we feel that in the big picture balance that certain areas should be set aside for fisheries values, really for multiple uses. I mean, I just concentrated on the fisheries values and my testimony does that, but these areas are being asked for set-asides for more than fisheries values.

The CHAIRMAN. I apologize to my colleagues for taking so much time, and actually I apologize to you all. I am going to have to leave shortly to make another appointment and ask Senator Murkowski to preside.

I would like to announce that additional questions for the record will be available for the witnesses. The minority would like to submit additional questions after the hearing, and the witnesses, if you would come directly here after the hearing and the staff will have those questions for you.

We ask that the answers be submitted as fast as is practical for you, because we do not want to delay the markup for that.

I would like to explain that we have heard testimony about the further studies which would enhance the legislation, and I am sure that that is true in this case and it is always true. But I think if we are going to keep control of this legislation, we have got to proceed to markup.

I hope we can find that fine balance between the environment and economics—environomics? What did you say it was?

Ms. TROLL. Environomics.

The CHAIRMAN. Environomics is better than envirocomics. [Laughter.]

The CHAIRMAN. But I hope we can make that proper balance, and I hope we can have those compromises made within this committee and then within a conference committee. I think that would be better than to let the matter be decided strictly on political grounds on the floor.

So we are going to try to do that as best we can, which is going to mean that we are going to have to work hard and we are going to have to get to it probably next week.

This panel has been very good. I appreciate your testimony, and we will further look at your written responses to the questions.

Senator Murkowski.

Senator MURKOWSKI. I would defer, Mr. Chairman, to Senator McClure. Thank you, Mr. Chairman, for holding this hearing.

Senator MCCLURE. Thank you, Mr. Chairman, and thank you, Senator Murkowski.

I will be very brief. I apologize for not having been here throughout the entire afternoon. There are a number of conferences going on with respect to the Clean Air Act, which also occupies a great deal of attention around here these days, and I cannot be two places at once.

I am very much interested in what happens in this legislation because I think it is typical of the kind of resource conflicts that we try to resolve and moderate by legislation. I am a little bit concerned about how well or poorly we do that.

I am somewhat struck by some inconsistencies, both in my own position and that of others. I point the finger first at myself because I realize none of us are terribly consistent where inconsistency serves our cause, and I think I detect a little bit of that here on the part of more than one.

Having said that, I also want to draw attention to my opening statement, which I believe has been placed in the record already. For those who want a larger statement of my concerns might find it there, but I will not take the time to repeat them all here.

Maybe I can start out with a very general question and then submit most of mine for the record. The general question to each of you would be: Why not wait for the forest management planning process? Mr. Metcalf?

Mr. METCALF. Yes, I would be delighted to respond to that. The forest plan that was originally promised back in 1987—and I have submitted that document for the record, or at least part of it—promised a number of things, and it promised that the plan would be in compliance with NFMA, the National Forest Management Act, NEPA, the National Environmental Policy Act, and ANILCA.

Because of serious problems with the plan, particularly the timber inventory, it would appear that the Forest Service is not going to be able to uphold that promise, and this was confirmed——

Senator MCCLURE. But are you not prejudging that at this point?

Mr. METCALF. No, sir, I do not believe so.

Senator MCCLURE. You have already concluded that you know what the answer is.

Mr. METCALF. No, I think in talking with the Forest Service that they said that they would not be able to resolve a number of issues, because of the problems with the timber information.

Senator MCCLURE. All right. Let me ask you this question in that connection. If indeed they cannot because they do not have enough information, how can we? We have substantially less information than they have.

Mr. METCALF. I think, as was stated earlier, the Tongass Forest is not managed like any other forest. It has the two 50-year contracts, and it has the mandated timber harvest. That in itself gets in the way of NFMA. The two contracts have not been brought into compliance with NFMA.

Senator MCCLURE. No, but I want to get back to that other question. If you say that the Forest Service admits that they cannot meet the mandates because they do not have enough information, then how can we legislate, having even less information than they have?

Mr. METCALF. Well, I think again that the information that we developed in the Tongass land management plan 1 is probably more site-specific, better information than what is available now.

Senator MCCLURE. You are suggesting what you have gone through is superior to what the Forest Service has gone through?

Mr. METCALF. No, I am talking about my experience with the Forest Service in developing the Tongass land management plan, and that the information that was developed in that plan was not as sophisticated, but it was more site-specific and could probably be used to resolve the problems better than the information they are now developing.

Senator MCCLURE. Mr. Griffin, do you have a comment?

Mr. GRIFFIN. Yes, sir. As I have stated earlier, the Southeast Conference is in favor of the TLMP process. We very much support that. It is a process that is well defined. People in Southeast Alaska understand it. They do respond to hearings, and if you think these discussions are heated, you ought to come to Sitka some time.

I would like to correct something, a statement Mr. Metcalf made, and that was that Sitka has not taken a position officially on this. They could not because they had not had a regularly scheduled meeting. They will be meeting tomorrow night and they will take a position, and I will supply the committee with that outcome.

Senator McClure. Thank you.

Mr. Lindh.

Mr. Lindh. Senator McClure, last spring when Governor Cooper testified in Sitka before this committee, he urged the committee to move forward with adopting the proposal that had been put forth by the Southeast Conference last March. He felt it was time to put the issues behind us.

The longer that this legislative material is delayed, it seems like the bigger the bite is taken. So there is that judgment.

Senator McClure. You are tired of waiting, you are tired of the fight; let us do it even if it is wrong?

Mr. Lindh. Well, no, I would not say do it if it is wrong. But it seems to be getting worse each year that we delay.

Senator McClure. All right. The fight gets worse, the information does not get better?

Mr. Lindh. Well, let me say something about information.

Senator McClure. Or is the fight irrespective of information?

Mr. Lindh. I think we are always looking for better information.

Senator McClure. But not waiting for it?

Mr. Lindh. Well, I think that the information that was available, that is available now, which was the data base that was used to develop the first TLMP document, is pretty good information. There has been a lot of new additional information available since then which is available to everyone.

Senator McClure. That has changed some minds, too, has it not? As we have gotten more information, some people have changed their minds?

Mr. Lindh. I think that it has changed some minds. In fact, I think that some of the more recent research that the National Marine Fisheries Service has done is the basis for all this talk about stream buffers. That is an example of using new information.

Senator McClure. And they have changed their mind?

Mr. Lindh. Pardon me?

Senator McClure. And they have changed their minds? They are now diametrically opposite of where they were ten years ago?

Mr. Lindh. I cannot speak for where they were ten years ago.

Senator McClure. Mr. Finney?

Mr. Finney. Yes, we certainly favor the TLMP process. We think it is going to give you the very best information and the best public input. It goes through the total environment process, where you have a draft environment impact statement. People will get to look at that draft, make comments on it, before the Forest Service makes a final record decision and goes to a final environmental impact statement.

We certainly favor that over some sort of a legislative, mandated solution.

Senator McClure. Ms. Troll.

Ms. Troll. The United Fishermen of Alaska, who testified on this issue a year or so ago, came out with a pro-multiple use position that recognized that there is an imbalance currently——

Senator McClure. I am not asking what your position is.I am asking whether you want to wait for the plan or not.

Ms. TROLL. TLMP, I was getting there. I will just get to it sooner, Senator.

We believe that the current TLMP process will not result in major changes. The sideboards driving that process are the 450 mandate, the 50-year timber contracts. No other national forest has those restraints to multiple use management.

Senator McCLURE. I understand that, but why do you not want to wait for the forest management planning process to be completed?

Ms. TROLL. I would like to have fair evaluation of all the alternatives, and if you modify the mandate and you modify——

Senator McCLURE. So you do not like the restrictions around the forest management planning process on the Tongass, so you do not want to wait for the results of that process because the restrictions distort the output, is that correct?

Ms. TROLL. Yes, it skews the results, because one multiple use, timber, has an advantage over all the other multiple uses.

Senator McCLURE. I understand.

Mr. Wilson.

Mr. WILSON. Senator McClure, Goldbelt supports the TLMP planning process and we do not feel it is unreasonable to ask that we wait a few months to get this information before we can make decisions that will be long-term decisions. I think we need and deserve the information base to make those decisions.

But if things have to move forward now, then we support the Southeast Conference 2 position.

Senator McCLURE. All right.

Now, I started out by saying all of us are a little inconsistent, and I want, before somebody else points it out to me, to confess why I said that. Governor Andrus and I worked out a wilderness bill compromise for the State of Idaho and all the environmental organizations are giving us hell for not waiting for the forest planning process because, after all, obviously the forest management process would produce superior results.

What it means is they did not like our proposal, and I understand that. But there is an inconsistency, just as I may be inconsistent today in suggesting maybe the forest management planning process would give us some information we do not have now.

I do not know the answer. I do know for myself one of the places where I start on this process is understanding for myself that when a deal is struck I try to keep it. And a deal was struck in ANILCA that really did deal with the questions of multiple use of the Tongass by assigning a great many of those resources to certain kinds of prescriptive management, including wilderness on some of those areas, and concentrating other portions of multiple use upon other, the remaining areas.

Maybe that is part of the problem. Maybe I have been around here too long and I remember some of those discussions and the actions that were taken here. I find it a little difficult to preside over the violation of agreements which were made, and there are violations.

Now, not all you folks were at that table when we worked on ANILCA, and I know that none of you are bound by what others may have agreed to some years ago.

But I am troubled if I sit here and listen to Alaskans tell us what they are willing to agree to by their elected representatives and by their representatives from non-elected groups, sometimes selected and sometimes self-appointed groups.

But they came here and told us what kind of tradeoffs you wanted for the State of Alaska, and if you would do this we would do that. National groups did so also. And now we are asked to change that, and I am wondering upon what basis we are being asked to change it.

New information? Or is it just a different perception of the kind of agreement that should have been struck? I think most of us have some idea what was behind 50-year contracts and why they were entered into, and why indeed those people who do not understand why they were there in the first place might criticize them.

I am not saying that a 50-year contract has to be lived up to unchanged for 50 years if you can negotiate agreements. But I am a little concerned about unilateral changes in agreements. We can all try to change an agreement and sit down and work out the conditions of that change.

But I am very much concerned if indeed you try to change it unilaterally with people who depended upon the agreement. Even the government ought to keep its bargains. Now, that is something I think most Alaskans would agree with, and I suspect if I did not like a bargain they had made I would try to undo it, too, because none of us are pure in this question of objectivity.

But I just note that the National Marine Fisheries Service a few years ago was advocating the necessity of keeping all woody debris out of such streams and the hand-cleaning of such streams to remove large woody debris, and today their position is diametrically opposite that.

I am not sure which is right or which is wrong. Maybe I do not even read the record right. But it seems to me we do evolve in our understanding of these issues, we do get new information. And I am trying in the process of all of this to sort out what is new information and what is old attitude, because if it is old attitude that predates the agreements and the conditions that were established, that is one thing.

If it is new information that tells us, hey, we understand better what the tradeoffs are today, we need to apply better information today to the old agreements, to the old understandings, to the old balances, I understand that.

But I do not quite understand that, if indeed we are going to change from the old tradeoffs that were established on the basis of new information that is supplied to us, why we do not want to wait and get better information.

I see you waving your pen around there and I assume that it is not because a fly is bothering you.

Dr. ANDERSON. No. Mr. Chairman, could I just offer a thought relative to—I am sorry, I am Dave Anderson with the Alaska Department of Fish and Game.

If I could just offer a thought relative to the contradiction that you mentioned, that all of us share in our own personal interests, which I would agree with. But in this particular case I think it is probably fair to say that the Alaska Department of Fish and Game has been more intimately involved in the development of the TLMP revision than any other agency outside the U.S. Forest Service.

We have had three or four years of very intense involvement in that process, and I would like to say, without elaborating if I could, that we have identified in the analysis of the management situation, both preliminary and technical, some very serious flaws, very serious gaps in information and data, upon which I would be very hesitant to base a management plan for the Tongass.

So the question then arises, I guess, whether or not to wait until that can be fixed. I personally do not believe it can be fixed in three months. Maybe we are looking at waiting a lot longer than that.

So the other side of that coin is then why go ahead and adopt legislation that would purportedly "fix" the situation still in the absence of information? And the only thought that I had to offer up on that, I suppose, is that as a natural resource manager or wildlife manager we are normally trained to try to manage resources in a conservative fashion in the absence of information.

I do not know how familiar you are with, for example, northern Chichagof Island, but things are proceeding very, very rapidly there under the status quo. Over the last two years I have flown that area periodically on about a three or four month basis, and the changes are very rapid, profound, and they are having some impacts I think that by the end of this winter we will be able to quantify, that are very serious for deer, very serious for brown bear populations.

All I am suggesting is that we are foreclosing options, I believe, by forestalling a process into the indefinite future in the hope that these very critical problems that we have identified in TLMP, some of them mentioned by Mr. Metcalf, which I agree with, are resolved.

Senator McCLURE. I understand that point. Even the resolution of some of those problems in the short term has also short term and long term consequences on other values. I do not blame you for being concerned about it and trying to preserve the area of your responsibility.

But there are other people that look at it entirely different and they see the tradeoffs that are going to affect them in the long term and the short term and say: Hey, do not change things until you know what you are going to do to us.

Dr. ANDERSON. Yes, I understand that, and being that principally the mandate that I have is to manage the fisheries and wildlife resources of the State, naturally I speak with that bias.

Senator McCLURE. Yes, I understand that and I think it is fair, and I do not blame you. I think that is your responsibility, just as the responsibility of other people, for whatever reason, is to speak from the standpoint of their point of view.

We try to sort all of that out, and I am trying to help in that process.

Thank you very much, Mr. Chairman. I will submit the balance of my questions for responses in writing.

Senator MURKOWSKI. Thank you very much, Senator McClure. I very much appreciate your attendance. It is regrettable that we could not have more representation here, but we do the best we can.

Which I guess leads one to reflect on the merits of the value of TLMP, and certainly there is a difference of opinion on whether the Congress of the United States should simply sit down and mark up ultimately the disposition of the Tongass, rather than rely on the input of the agency that Congress expects to manage the forest, namely, the United States Forest Service.

One could conclude from this hearing that there is a good deal of doubt as to the capability of the Forest Service. What I find rather extraordinary, however, is the fact that you expect the magic of the makeup of the members of the United States Senate, who obviously have little expertise in the professional forest practice management concept, to do this for you.

As a consequence, if you leave it up to members of Congress, why, you are going to get a composite of opinions that are not necessarily directed by any intimate knowledge of the facts, but rather pressures from lobbyists, environmentalists, development-oriented groups.

It hardly seems to be the best method, but nevertheless certainly a segment of the witnesses today have suggested that.

Senator McCLURE. If the chairman would yield.

Senator MURKOWSKI. I would be happy to.

Senator McCLURE. I am puzzled by one thing that came to my attention just recently. I think you may have made reference to it in your opening statement, and that is the fact that on an equal timber base in the State of New York they cut much more wood for fire wood in the State of New York than they do off the Tongass in timber harvest, and yet the people in New York want to stop the timber harvest in the Tongass.

Senator MURKOWSKI. That is correct.

Senator McCLURE. But then it never did deter the Congress that they do not know what the hell they are doing.

Senator MURKOWSKI. Well, I do not want to leave this group without an unspoken thought, so we will continue. But from my own experience around here, it would be nice to make our decisions on sound scientific knowledge, and I am sure that most of the members of the panel would agree with that.

The question of the value of the TLMP which is about to come down on us I think has some merit for reflection, because it is mandated under the law that there be a ten-year revision.

The Tongass happens to be the first. I gather that the other forests have been held up in litigation, and as a consequence even the system designed by Congress cannot beat the full employment act for some of the lawyers. So, as a consequence, we are left in this terrible dilemma of trying to mandate by law the input of a revision and not getting to it.

Yet the first one that comes in, there are differences of opinion on whether it is any good before it is even proposed, and it is questioned before it is even done. One wonders then what the alternative is, and you are seeing the alternative, represented by the number of Senators that have attended this hearing today, who are going to be involved in the markup of this legislation, and the tremendous environmental and development pressures that are going to be placed on this process.

So you are going to get about what you are seeing, and that is perhaps not the best state of affairs. It would seem to me if the taxpayers are spending some 5 to 7—I thought it was $5 million, but I am told it is $7 million—mandated by law for this evaluation, and we have gone to the trouble of holding I think 30 hearings in Alaska, to hear from Alaskans on what their wishes are—and I think the State Department of Fish and Game, as has been acknowledged, has been a major factor in that—it is hard for me to conclude that it has no value.

I was heartened by the chairman's reflection that obviously it would be something that could be taken up prior to the conferences. But that is another matter.

I just wanted to get that out of my system, because I think it is fair to reflect on it. A point came up I think with Ms. Troll's reference to the position of the fishing industry or the fishermen, basically to do away with, I think you used the word "sideboards," the parameters, to do away with the 450, renegotiate the contracts.

We could do that. That is in one of the bills, and leave the land designation up to TLMP. Would you find that—in other words, when I say leave it up, leave the recommendations, and then obviously the designation is going to be made by Congress.

Is that within the realm of acceptance, because that is basically what you said. Mr. Metcalf implied that as well.

Ms. TROLL. We have not reviewed that particular option. The comments that I am making about the set-aside areas are the fact that they are out there and I want to address the political realities that they will be discussed and negotiated once again, and wanted to provide you with the input of the fishing community.

United Fishermen of Alaska has never talked about the set-aside areas waiting on that particular portion to TLMP, and I would be glad to have that discussion and see where we are on that.

Senator MURKOWSKI. We would appreciate that and would invite you to reflect on it, and if you care to submit it, why, I think it would be worth looking at.

Jim, you were around here during the time of the original designation in the eighties, and I do not know what you anticipated in the nineties. But I think it is fair to say that, regardless of what happens, assuming that we maintain the viability of the contracts, that, oh, I think in 14 years one contract will have expired, and in 21 years the other contract will have expired.

So the Congress is going to have a designated additional opportunity to address this matter if the contracts are still in effect. I would like to have for the record specifically the notation that these contracts, that each year goes by and they get closer to the expiration of the contracts.

Another observation that I think bears some reflection is the question of enhancement. I am looking at various references to the Forest Service enhancement, construction of fish ladders, seeding of lakes, concurrent Forest Service fisheries enhancement work that has the potential to bring an additional eight to ten million pounds of salmon into the nets each year.

Of course, that is perhaps a little pie in the sky. But it is interesting to note the production figures each year in Southeastern Alaska; we have seen a gradual increase, I think United Fishermen would agree, this last year in Southeastern over the previous year.

Then we took a dump two years ago, and some of us would like to think and some of the fishermen have indicated to me specifically their concern that this is as a consequence of the driftnet fishery on the high seas. And you know, we have all been working hard to try and corral the Taiwanese and the Koreans and the Japanese.

I think we have made some progress in that regard. But the difficulty you run into is, if we are expending our energies on each other, oftentimes we lose sight of the goal and the objective.

I am looking at figures here that indicate from 1979 to 1988 the millions of pounds of salmon in Southeastern Alaska, and they have gone from 72 in 1979 up to 93, 110, 123, 155, 154, 231, 215, then down to 73 and up to 90.

However, the good news is that the value of that fishery has gone up, from $84 million in 1979 to $82 million in 1984, to $108 million in 1988. So I would like the record at least to reflect that, in spite of a period of nine years of timber harvest, that while our fisheries have not been perhaps what we would like them to be, they have increased substantially in dollar value to our fishermen and to the fishermen of the State of Washington and Oregon as well.

So maybe we have not done too bad a job in having a resource industry, a timber industry, which has made a lot of mistakes and a Forest Service that perhaps could have done a lot better job, and a Native community and private timber holders that maybe could have had better forest management practices.

But the difficulty we have in formulating legislation, ladies and gentlemen, is when we have such diversity from constituents that it is very, very easy to have my colleagues say: Well, clearly there is no uniformity in what Alaskans want; therefore we are going to give them what they get.

I know that is not what you have me here for, but nevertheless I think in fairness that I should explain the difficulty. And I would clearly like to see us be able to work from an accord, but obviously sometimes that is a bit impossible.

I would like to clear up one mystery here that I have, and that is who is biggest. Because Kate, you have indicated some figures relative to the contribution of the fishing industry, and I am well aware of that. And there is another series of figures relative to the contribution of the timber industry.

I think for the sake of the accuracy of this hearing record, it is probably appropriate that we at least address it for a few minutes.

What happens up here is you get so darn much paper you cannot find it, but I found it now, somewhere here. I have got my troops here surrounding me.

According to the Alaska Department of Labor, they say that the forest products industry is 31 percent of the economy of Southeastern and contributes 4,500 jobs; and the seafood industry is 27 percent of the economy and contributes 3,990 jobs.

Then the McDowell report, which I have in front of me, says that the seafood industry is 27 percent and 3,990 jobs, and the Tongass forest products industry is 24 percent and 3,500 jobs, and all other forest products another seven percent, 1,000 jobs.

My question is, who is right?

Ms. TROLL. I will be real diplomatic about this. I think that when you look at the McDowell report, you will find that the seafood industry and the timber industry make pretty much on par equal contribution to the regional economy of Southeast Alaska.

A lot of this discussion gets to being the timber jobs versus the environment, and the reason I keep bringing up the job contribution that we make is it is oftentimes overlooked.

The Department of Labor statistics as you used, Senator, they do not take into account the seasonal employment, where the McDowell report was the first of its kind that changed, actually went in and did the survey of crew members and all, the skippers and everything else.

Those sorts of employee relationships do not lend themselves to Department of Labor statistics. McDowell actually went in and surveyed and got them, and that was the first real definitive study that we had about the contributions of the seafood industry.

I do not have my McDowell report in front of me, but I remember it being about 4300, which is comparable to the statement——

Senator MURKOWSKI. Well, I would buy a tossup, so I am not going to pursue it.

Ms. TROLL. Senator, if I could just comment.

Senator MURKOWSKI. Mr. Finney is nudging you a little bit. Go ahead.

Ms. TROLL. I just wanted to go back to your earlier statement about the fact of the fluctuations in the fish runs and start right off by thanking you for your aggressive leadership on the driftnet issue. As I stated earlier and in our previous testimony, it is our intent that once we get that issue satisfactorily resolved that we have someplace for the fish to come back.

Senator MURKOWSKI. I hope so.

Ms. TROLL. Some of the systems that were indeed very heavily logged have not come back yet, and so that is why we still feel there is substantial need for buffers. When you look at the sites in the areas and case by case things, it does weigh out.

Also, as you know, fluctuations are a result of fish and game management. For many of those years in the early seventies there was no fishing. We had to sit tied to the dock. We incurred an economic cost to allow that production to come back up.

There is lots of reasons for the fluctuations. We do not point the finger that logging is the result of all of those fluctuations. We do have evidence to show that we can minimize logging impact to fish by the buffers, and that is where we are coming from.

But thanks again for all your work.

Senator MURKOWSKI. I appreciate that. I think we have got an interesting deal with the Taiwanese which was just signed last night, that we can talk about at a later time. But it is better than it was. It is not perfect, but better nevertheless.

I am curious to know how the two of you feel the tourism industry rolls into this, because there are those that suggest: Well, you know, the tourist sees the clearcut and goes away with a bad taste in his mouth. We have got clearcuts which are on Forest Service land, we have got clearcuts which are on Native land, and that is a reality.

But the Forest Service has had practices of late on the major areas of cruising, to try and have those areas less visible, and of course the regrowth comes back in 10 or 15 years and it is pretty hard to see.

But a point has been made that if you did not have the industry at the level that you have in Southeastern today, the tourist industry would not be able to enjoy the facilities which it enjoys, namely the tugs, the number of air flights into Ketchikan or Juneau or Sitka.

I wonder, probably Mr. Finney, if you would care to enlighten us to some extent on the significance of the investment in the timber industry that leads to the resources available to the tourist industry.

Mr. FINNEY. I think it is very true, Senator, that the infrastructure is being built by the timber industry in a lot of those areas, and that they are building. Out on Prince of Wales Island, there is 700 miles of drivable road. There is another probably 700 miles of road that has been put back to bed and will not be used until the next century.

But we are finding now that the tourist industry, one of their largest destinations on our ferry system is Prince of Wales Island, where people are landing their campers and starting to drive that road system. It is the only large contiguous road system in Southeast Alaska.

As I said earlier in my testimony, Ketchikan only has 20 miles of road, roughly 20 miles of road north and 20 miles south of town. That is the end of our world. But the reason it does not go any further is because there is not a contiguous timber supply to carry those roads. So that is one thing.

The other thing is that the timber industry, a lot of those people in the camps are there year-round. They sustain the air traffic that the tourists use in the summertime to make their flight-seeing trips through Misty Fjords and those areas.

If the timber industry was not there to sustain that year-round, those airplanes would have to leave in the wintertime and only come back in the summertime. It would be less economic to the tourist industry than they were by having them supported by the timber industry.

Senator MURKOWSKI. I assume the tugs, too, are a factor for docking?

Mr. FINNEY. Yes, plus the freight boats that deliver the supplies and so forth to the outlying areas. There is more and more fishing camps and areas building up on Prince of Wales and in other areas that are dealing with tourists, and those are supplied by the same facilities and the same infrastructure that supplies the timber industry.

On an earlier question, I just wanted to make perhaps a clarification on the people thing that you had with the McDowell report between the fishing and the logging. McDowell when they did the logging used year-round job equivalents, in that they took each month of employment in the logging industry and added those together and divided by twelve.

My understanding from what Kate said about the fishing industry, they took only a job. If a fishing skipper's job is to man a boat for two months and he manned it for that month, they count that a job, if he manned it for those two months, if he was on his job all the time.

But it is not year-round job equivalents. So that could account for some of those differences that you are talking about.

Senator MURKOWSKI. Thank you.

Mr. Lindh, I am wondering. You have seen the maps; we see the blue areas, which are clearly wilderness, and the realization that there is not going to be any activity through those. How important is it in your opinion and from the standpoint of speaking for the State of Alaska, that some type of transportation or utility arteries are maintained in certain areas where they are not precluded currently by existing wildernesses?

Is this a significant factor in the opinion of the State and the Governor?

Mr. LINDH. Yes, Senator, transportation needs for the region are definitely a concern of the State. The notion that areas, that the twelve areas that we have identified be put into a protected no-cut status, that concept would provide for other kinds of activities in those areas. Roads per se would not be prohibited.

Using the administrative term LUD-II, which was developed in 1979 as part of TLMP, there is a provision in that for roads, state transportation needs, Forest Service roads that they identify through their process as part of a forest plan.

Obviously, Title XI of ANILCA does have a provision for Congressional authorization of roads through existing wilderness. But we are certainly not advocating wilderness here. We are advocating something considerably less restrictive, where access needs can certainly be considered in the broader context of land use planning.

Senator MURKOWSKI. To touch a little bit on the Southeast Conference, it is my recollection that as we address consensus you get different meanings depending on what your interpretation of consensus is.

The first vote of the Southeast Conference was six to five, is that right?

Ms. TROLL. Seven-five.

Senator MURKOWSKI. Seven-five, okay. I was only off one. That is not bad.

And the second vote was nine to two, is that about right? There were three votes.

Mr. LINDH. I think those are approximately. I think Mr. Griffin can comment on that.

Senator MURKOWSKI. Mr. Griffin, can you enlighten us on the difference between the votes? I mean, they both were representative of a consensus.

Mr. GRIFFIN. The vote on the first one was seven to four. There are eleven members on the board. Seven to five does not add up to eleven.

The vote on number two was nine to two. A number of the original members of the board, as I mentioned earlier, switched their vote to vote in favor of the second proposal.

Senator MURKOWSKI. There has been a lot of finger-pointing on the Southeast Conference 1 and 2. And I think it was interesting, somebody in the panel indicated—perhaps it was Mr. Griffin—that the directors did not have an opportunity to address the maps and the significance of what the maps meant, and that was designated to administrative personnel or something of that nature.

Is that correct, Mr. Griffin?

Mr. GRIFFIN. Yes. I have been told by those members who were on the board—I was not on the board for Southeast Conference proposal 1. The members that were indicated to me that they had not seen maps prior to voting.

Senator MURKOWSKI. It is unfortunate that the press is not here, because the public in Alaska will have to rely on the television, which is all right with me.

But to go back in retrospect, where we ran into a problem when we were negotiating with the House was over what the intent of the Southeast Conference was towards land designation, because, in spite of what you might think, once we permanentize land designation in an agreement, that is just what we are doing.

And Mr. Lindh, the LUD-II designation means different things to different people. I am reading from the definition here of the land management plan, the definition of LUD-II under the designation, the purpose: "Areas allocated to LUD-II are to be managed in a roadless state, to retain their wild land character. But this would permit wildlife, fish habitat improvement, and primitive recreation facility development."

It further says: "Roads will not be built except to serve authorized activities, such as mining, power, water development, aquaculture development, transportation needs determined by the State of Alaska, and vital forest transportation linkage."

One can get into the use of snowmobiles, airplanes on fresh water may be permitted, and so forth.

We wanted to make very sure of what the interpretation of the Southeast Conference was towards the designation of this, because we were very concerned that an administrator—and we have all had experience with administrators—would read this to mean managed in a roadless state and retain the wild land character.

It just depends on how broad you want to interpret it, and we felt—and we have been chastised by various newspapers in Juneau, by various groups in Alaska, for a dramatic change in the interpretation. I can assure you, speaking as one who had the obligation to try and negotiate a resolution, it was an honorable effort to dictate, get a dictate from the Southeast Conference as to what they meant.

Now, the fact is that the Southeast Conference chose to go into the land matter and indicate changes in the land and an additional 10,000 acres is noted, but that was not the purpose we wanted clarified.

So I would like the record to reflect indeed the interpretation which we were after. We got it and that is really all it amounted to.

I would like to ask Mr. Metcalf and Mr. Anderson if you basically support the concept of wildlife management predator control? I am speaking primarily of reducing the number of wolves so that you can enhance the deer population.

Mr. Anderson?

Dr. ANDERSON. As you may be aware, Senator Murkowski, the Alaska Department of Fish and Game and the State of Alaska has been caught up in a very, very long, heated debate over this issue of predator control or predator management. The Board of Game, of course, has been intimately involved in that as well.

About a year or two ago we were instructed by the Board of Game to develop a public participation process, which we are now heavily involved in within the State of Alaska, to develop a consensus on what is acceptable manipulation, if any, of predator-prey systems, what techniques should be allowed, what techniques should not be allowed.

At this point in time, the Alaska Department of Fish and Game, Division of Wildlife Conservation, is withholding judgment on that issue pending a resolution through this process.

Senator MURKOWSKI. Through a process of consensus?

Dr. ANDERSON. Through a consensus-building process that is going to involve representation from a broad spectrum of interested publics, one of which will be the Department.

Senator MURKOWSKI. One of which will be the what?

Dr. ANDERSON. One of which will be a representative from the Department of Fish and Game.

Senator MURKOWSKI. But you are going to formulate a predator policy based on a consensus, and I assume you have got scientific studies which draw some conclusions, just like we do here with the TLMP, which we may or may not agree with, but nevertheless have.

Dr. ANDERSON. That is right, there are studies, there are scientific studies that indicate that over the short term it is possible to increase the number of ungulates by reducing wolf populations in some areas.

There are no studies to my knowledge that indicate that that is a long-term solution, but rather it has to be something that is implemented over and over again, perhaps at very great cost.

Senator MURKOWSKI. Do we know why the deer take on the ABC Islands is two or three a year, whatever it is, and on the other islands it is much less?

Dr. ANDERSON. Do we know why the bag limit——

Senator MURKOWSKI. Why the limits are higher on the ABC Islands and less on the other islands?

Dr. ANDERSON. Yes, of course, because the Board of Game set those limits higher at the request of the Department and the concurrence of the advisory committee several years ago, because of the abundance of deer on those islands is higher.

Senator MURKOWSKI. Is there a reason for abundance of deer on those islands?

Dr. ANDERSON. Is there a reason? Well, there are a number of reasons. First of all, they are maritime islands. As you move west away from the coastline, the habitat improves because the climate moderates, snow depths are lower.

There is on Admiralty Island and portions of Baranof and Chichagof excellent wildlife or deer habitat, high volume stands that don't occur on the mainland.

There is another reason that is a speculative reason to some extent, but I suspect that it is true, and that is that wolves are absent from those islands.

Senator **Murkowski**. I suspect.

Dr. **Anderson**. And if you are wondering if wolves eat deer, the answer to that question is affirmative.

Senator **Murkowski**. How many deer are taken? In other words, a pack of wolves will eat how many deer?

Dr. **Anderson**. We went through this a year ago.

Senator **Murkowski**. I don't remember the figures.

Dr. **Anderson**. I do not have those figures in my head. I would be happy to provide them to you.

Senator **Murkowski**. Thank you.

I assume that the islands, Baranof, Zurembo, Etolin, Revella, are all islands that have large populations of wolves on them today?

Dr. **Anderson**. Not large populations. The populations vary considerably. Etolin Island has a very low wolf population.

Senator **Murkowski**. How about QU?

Dr. **Anderson**. QU has a moderate wolf population.

Interestingly enough, Etolin has a low wolf population, also a very low deer population.

Senator **Murkowski**. Well, it is not relevant to this particular hearing, but I wanted to bring it out because I think it represents the same problem we have here of trying to make a decision on whether the TLMP should be accorded consideration in the dictate of the Tongass and the same situation as with the State of Alaska reflecting on what to do about predator control and what is a reasonable length of time.

As long as I can remember, the debate has been on about what to do about it. But clearly, because of public opinion and divergence of views, it is pretty hard to reach a consensus, so the easiest thing is to do nothing.

Dr. **Anderson**. Well, Senator, the hope is that we are not doing nothing, but that we are entering into some sort of meaningful process.

But I would be the first to admit that this has been a difficult problem. I would also be the first to admit the Department of Fish and Game has made some serious errors in its handling of this process in the past, including the way the public has been dealt with, and we are trying to rectify that.

Senator **Murkowski**. Well, I guess I am a little biased on the subject, because I can remember living in Wrangell and watching the decimation, if you will, of the deer population on Warinofsky Island from the wolves, and then finally the wolves died off, and it all is happening again. But I will not reflect too much on that.

Dr. **Anderson**. We also have cougars in Southeast now. We also have cougars in Southeast now, at least one that we are aware of.

Senator **Murkowski**. Do the best you can.

I do not see anybody from the industry here that can relate to—if we cancel the contracts, how much is it going to cost the Federal government? Does anybody know? Are there any figures on that?

Mr. **Finney**. I might help a little bit.

Senator **Murkowski**. I know the lawyers are going to get paid.

Mr. FINNEY. First I want to say I am not authorized to speak for either one of the pulp mills. But it would involve, cancellation would involve a breach of contract and a taking, and I have heard the figure quoted that it would be over a billion dollars.

But that is only part of the effect of cancelling those long-term timber sales. It is not just the money that is going to be paid out to the pulp mills. It is the hardships that would happen should those mills then close because of that cancellation, which my estimate is they would in a very difficult market.

Then you have all of the contractors who are in place for roadbuilding and logging to supply those mills, and what about those people? They are going to be hurt very bad. Will they have a demand on the government?

Then the people who really, really get hurt are the people who have jobs out on those islands. How about the people that live in the large logging communities that are supported by those long-term timber sales?

Upon cancellation, my understanding is the Forest Service immediately has to move out all of the facilities that exist in those camps. They cannot sell independent timber sale programs in those areas and let the facilities stay there, because if they did the pulp companies then are going to have a leg up for bidding on that timber because they own the facilities.

They are only there because they are under a special use permit allowed by the long-term timber sales, which will be cancelled when those timber sales end. So it would be, I would guess, several years before those people who have jobs could relocate and find places where there are, the Forest Service is able to bid independent timber sales, and those people could move back into the area.

It would be devastating to the people who work on the national forest in the timber industry.

Senator MURKOWSKI. Mr. Finney, there is a planted question here: In 1976 Congress passed the National Forest Management Act by adopting the proposal by Senator Humphrey instead of the proposal by Senator Randolph. Do you recall that, and can you in 30 seconds explain the difference between the two proposals?

Mr. FINNEY. Well, Senator, I remember from that process in the 1980's that Senator Randolph was trying to convince the Congress that they should use prescriptive methods, that they should pass very strict prescriptive methods for the forest industry on the Tongass.

Senator Humphrey held out that they should be broader, they should be based on the TLMP information that was present at that time. Fortunately, Senator Humphrey was the one who prevailed in the argument.

Mr. METCALF. Senator Murkowski, I think that obviously there are several scenarios. It has never been our intention to close the pulp mills through H.R. 987, and I do not think that they would be closed.

CRS estimated that, if there were any awards of damages, it would be $25 to $125 million. I think that it is important to recognize that those jobs would still be there, the timber would still be there, that the forest simply would be managed on a more multiple use keel than what it is now.

Senator **Murkowski**. You are concluding that the pulp mills would be there?

Mr. **Metcalf**. Yes.

Senator **Murkowski**. Without the contracts?

Mr. **Metcalf**. Yes, and that the National Forest Management Act—you brought that point up and I think it is important to recognize that the two contracts are not in compliance with the National Forest Management Act, and I would be glad to supply you with that written information.

Senator **Murkowski**. Please do. Anyone differ with that? Kate?

Ms. **Troll**. No, I do not differ. I guess I just wanted to, since I got your attention, to go back to one quick point and let you know that buffer strips would also have a play into the tourist industry, because of the heavy sport fishing and the charter industry, which is one of Ketchikan's growing sectors of its economy.

There is a linkage there obviously between timber and tourism support, and I just wanted to add in that there is also a linkage from the buffer strip as it relates to sport fish and charter boats and all of that.

Senator **Murkowski**. There is a beach fringe to be maintained for browse for the deer and the strips and so forth.

Then one goes back to the realization that if you are in your hotel in Juneau and you open up the window, everything you see is second growth. That is almost true in Sitka, as well its second growth.

You go over to Prince of Wales Island where they logged during the Second World War and, where is it, at Hollis, where they took all the spruce out, and today there is some of the finest second growth you would find anywhere in the world.

Ms. **Troll**. I have a recreational cabin site in one of those second growth forests.

Senator **Murkowski**. It is a beautiful area.

Ms. **Troll**. Yes.

Senator **Murkowski**. It is much more productive than the other. So you know, it is this whole issue of balance. A lot of people do not recognize that one-third of the commercial forest is set aside in perpetuity in a wilderness, and that is dying and it is growing, and that is the state it should be in.

But unfortunately, we cannot do anything to enhance the fishery in that area, which, you know, would get you an argument in any corner.

Mr. Griffin, what is the Southeast Conference's position, one more time, on buffer strips, because we spent a lot of time on that today?

Mr. **Griffin**. Well, sir, apparently not all the information got to the committee, and if you would allow me to read a letter——

Senator **Murkowski**. I would rather you did not read a letter. I would rather have you summarize.

Mr. **Griffin**. Okay.

Senator **Murkowski**. You are an educator and can do well summarizing.

Mr. **Griffin**. Some would question that, sir.

The Conference has taken a position that the Forest Service in its management practices take under strong consideration the National Marine Fisheries Service's concerns concerning buffer strips. Again being consistent as far as the TLMP process is concerned, we feel strongly that all information should be considered, and we feel also that possibly NMFS has some information that the Forest Service should share.

Senator MURKOWSKI. Have you had a chance to talk to the Governor on the change in the Southeast Conference position?

Mr. GRIFFIN. No, sir, I have not had the opportunity. Mr. Ferry, the President, and myself tried to meet with the Governor, but he was otherwise occupied and Mr. Lindh and another gentleman met with us.

Senator MURKOWSKI. Am I correct in understanding that the Southeast Conference land proposal is to be considered by us only if Congress chooses not to wait for TLMP?

Mr. GRIFFIN. That is correct, sir.

Senator MURKOWSKI. Did the first Southeast Conference position take the same approach?

Mr. GRIFFIN. Yes, sir, that is consistent with the first Conference.

Senator MURKOWSKI. Well, we have got our marching orders again.

Joe, over in Goldbelt you are still trying to stay alive, and they have surrounded you with wilderness?

Mr. WILSON. Yes, they have.

Senator MURKOWSKI. You moved off Admiralty in good faith and now you are stuck.

Mr. WILSON. The wagon trains have circled Goldbelt property.

Senator MURKOWSKI. They are all Federal.

I assume that there is nothing to trade? I mean, what is your leverage? Have you got any?

Mr. WILSON. Well, we looked at those five timber sales surrounding Goldbelt property and, in an effort to allow us to compromise and allow us to remain at Hobart Bay because that is where our substantial investment is, we proposed essentially what the Southeast Conference 2 adopted, which was we did some redrawing of the lines on the Chuck River, that was under no-timber harvest.

Essentially, the Chuck River north of Silver Creek, which flows sort of into Windham Bay, would still be protected, and the Chuck River that is south of Silver Creek would be under Forest Service management for harvesting.

Under that kind of a compromise, it would be economically feasible for Goldbelt to remain at Hobart Bay.

Senator MURKOWSKI. The sensitivity of the fisheries has been highlighted here throughout the hearing. What do you folks do to enhance the fish habitat, recognizing—I am talking with Mr. Wilson now specifically in the Goldbelt area.

You have got loggers and you have got fishermen, and they are your own people in both instances.

Mr. WILSON. Yes, that is true. We are subject to the forest practice requirements and also, as I mentioned in my statement, we have logged on the headwaters of the Chuck River for the past three years now. We have also logged in other I think important salmon streams that lie within the Hobart Bay ownership of Goldbelt, which are the Lorris Creek and Sawchuck.

We have checked the Alaska Department of Fish and Game commercial fisheries pink salmon escapement surveys going back to 1960 to the present, up through 1988, and essentially it shows that there has not been any detrimental effect on the salmon escapement as a result of logging that has occurred essentially since 1982 on Goldbelt property.

Senator MURKOWSKI. I wonder—I do not want to get into an argument here, but for the record—if there are any strong opinions on who has got the best forest management practices, the State or the Forest Service?

Mr. LINDH. I would like to comment on that.

Senator MURKOWSKI. You want to get into that?

Mr. LINDH. There is plenty. I am sure we can all say something.

I think last year the Governor recognized that the forest practices in-state were in need of some serious review and asked for a review to be conducted by a joint effort of industry and State agency, fisheries and environmental organizations.

Before the State legislature right now is a substantially revised Forest Practices Act which, if it is enacted, will improve not only the practices on private land, but substantially improve the practices on State and municipal forest lands throughout the State.

So I would say that probably the current statute that applies does not provide the kind of protection which Federal law should provide on national forest land.

Senator MURKOWSKI. Ms. Troll?

Ms. TROLL. Yes, I will agree with that. The current Forest Practices Act provides for minimal protection. There is no requirement for streamside buffers or anything of the like on private operations.

State lands are covered under a State forest land planning process.

Senator MURKOWSKI. Yet there is more volume being cut currently, or just about as much, from the private lands?

Ms. TROLL. Yes, these past few years.

Senator MURKOWSKI. And there are no buffer requirements?

Ms. TROLL. And that is why it has been a number one priority with the United Fishermen of Alaska to work with the Governor. We advocated that this steering committee process be formulated. We have actively participated in that.

It was an oversight that in our opinion was long needed. We needed it five, ten years ago. But we are glad to see that we have made progress on that.

Senator MURKOWSKI. Do we know what current progress we have made? I mean, is it going to be adopted or is it not?

Mr. LINDH. Senator, it is basically up to the State legislature.

Senator MURKOWSKI. They can go back on a private sale and mandate as a matter of forest practices the mandate of buffers on private land?

Mr. LINDH. Senator, the industry participants in the consensus process have agreed to restrictions on their ability to harvest timber next to salmon streams. They have done that in the broader context of agreeing on a whole host of things, which is a very fragile consensus, but it is remarkable that it was put together in the eight or so months that it took.

Senator **Murkowski**. I mean, is it enforced? Who enforces that?

Mr. **Finney**. Let me add to what he said. The consensus group that worked, the steering committee that worked, getting the consensus that the State has in their process agreed that a site-specific method would be better, but that the State does not have the resources to do that.

They do not have the people nor the inclination to do it. So they have made some prescriptive buffer strips. But within that they have allowed the operators, the private sale operators, to remove a certain amount of that timber, which amounts to a site by site, a site-specific way of harvesting the timber.

In other words, they can take out some of the larger trees. They are only required to leave a certain amount of the total basal area within the area that they are going to harvest.

Ms. **Troll**. I have to object. There is no statement in the agreement that says the site-specific approach is preferred. And what is on private land also goes by channel types, Class A, B, and C, very similar to Class I, II, and III, but with some modifications.

There are prescriptive standards by those three channel types for private land. For State lands, it is 30 meters.

Mr. **Finney**. But again, the prescription is less than the total amount of timber that is within the buffer area, and the operator on private land gets the opportunity to decide up to a certain amount of that that he can remove, which makes it a site-specific management.

I did not say—I agree with Kate, the agreement did not say that it is a site-specific management. But it in effect becomes one, because they are allowed to adjust it after it is established.

Mr. **Metcalf**. Senator Murkowski.

Senator **Murkowski**. What occurs to me—just a minute and then I will call on you—is that we have a rather interesting inconsistency here. We have the State coming down, and mandating a position on buffer strips which, I think it is fair to say, the general consensus is that it is 100 feet on Class I.

Is that generally? Mr. Lindh?

Mr. **Lindh**. The term that I used, because I think that there is confusion over Class I and Class II, is anadromous and high value resident fisheries.

Senator **Murkowski**. But then the State of Alaska, on its management of private land under the Forest Practices Act, has something that is a little less clear, and I am not sure from your expert testimony just what it is, but you hope that it will be better than it was.

But it is less than a mandatory 100-foot buffer, even though the United Fishermen of Alaska and others are urging that they have something similar. Is that a fair generalization?

Mr. **Lindh**. Senator, you understand that that proposed legislation is a result of consensus between some very differing interests, and consequently——

Senator **Murkowski**. Some of them are in the back room.

Mr. **Lindh**. Yes, right.

Some of the standards, the standards for stream protection, are not the same on public and private lands. There was an early recognition that private landowners could not be expected to perform to the same level of public needs as one would expect on public lands.

Senator MURKOWSKI. I agree with you there. But you would expect the State of Alaska to at least enunciate, from a point of wishful thinking at least, a parallel, a policy, since the State is responsible for its forest management practices on private land and it is voicing its opinion on what is desirable on Federal land within the State of Alaska.

From the standpoint of the Department of Fish and Game, Mr. Anderson, do you have any comment on the degree of satisfaction that you folks have with the forest practices on private land?

Dr. ANDERSON. Compared to existing forest practices on private land, I would say that the Department of Fish and Game is not pleased with the current situation. We would like to see changes there as well.

Senator MURKOWSKI. Do you think that they ought to be comparable changes? In other words, in the sense that whatever is mandated for Federal lands should be mandated for State land and private land in the State as well? Because you can set your own policies on State land, but unfortunately there is very little of it.

Dr. ANDERSON. I think I will defer to Craig on that point if I could.

Mr. LINDH. Senator, the Department of Fish and Game was one of the participating agencies in that consensus process, and the agreement which is before the State legislature, the Department of Fish and Game agrees with what is in it.

It is clearly not what any one individual would like to see as being the best possible for their own interests. But everybody around that negotiating table recognized that it was a pretty good package that they could live with.

So again to reiterate, the protection on private lands afforded by the new Forest Practices Act is considerably greater than what is under the current Act.

Senator MURKOWSKI. But it is less than under the Federal?

Mr. LINDH. Less than on public lands.

Senator MURKOWSKI. How about, where is it in relationship to State lands?

Mr. LINDH. It is less than State lands.

Senator MURKOWSKI. We are setting a higher standard for Federal, then we are going down to State, and the lowest will be private?

Mr. LINDH. I understand that the highest standard that has been agreed to will be for State lands.

Senator MURKOWSKI. State, so you do have buffer strips on State lands?

Mr. LINDH. That is proposed in the legislation.

Senator MURKOWSKI. You do not have it now?

Mr. LINDH. They are done on a case by case approach now.

Ms. TROLL. Yes, and in those area forest land use plans when they are done, they have through the planning process established 100-foot buffers on anadromous streams.

I would like to point out that on private lands the prescription is 50 feet no-cut, second 50 feet 50 percent harvest, given a size distribution. So there is a prescriptive standard in place.

We are talking, there is a statement in the proposed legislation or in the agreement that says that the same degree of protection provided on State lands should be provided for on Federal lands. What the State then chose to do was to leave that discretion as to what constitutes comparable protection.

But there is a clear statement of policy that the same degree of protection on State public waters, streams, should be provided on Federal public waters, that the public resource of anadromous streams deserves the same degree of protection.

Senator MURKOWSKI. Is it true that the State pays the private holder to leave fringes, and they have got some kind of a formula that I do not understand?

Ms. TROLL. Only if they exceed a cap, a five percent basal area cap.

Senator MURKOWSKI. So that means that if the private, the Native corporation, leaves only five percent?

Ms. TROLL. Of the basal area or a comparable measurement.

Senator MURKOWSKI. Basal area means?

Ms. TROLL. That was a slight change in the current legislation from before.

Senator MURKOWSKI. So the State is paying them to leave?

Ms. TROLL. No, not necessarily paying them. The State can allow the private operator, if he exceeds that five percent basal cap, to go into another area to get comparable timber value.

Senator MURKOWSKI. Out of the private sector, in other words?

Ms. TROLL. No, out of the leave strip, out of the buffer strip. So that the principle of compensation is established, but it is not necessarily going to be one in cash.

Senator MURKOWSKI. That is interesting. It is not in cash, but it can be in kind.

Ms. TROLL. And it is only if in this process of applying these standards, which we feel the application of these standards will not exceed the five percent in 95 percent of the cases. There has been documentation to show in a watershed that is highly convoluted, lots of streams, that you may indeed exceed the five percent basal area cap or comparable measure, and that, understanding the importance of recognizing the taking issue that the private industry had and the State's Constitution as it regards the private sector, it was felt that we had to recognize some mechanism for respecting compensation.

This was, as Craig pointed out, part of the very sensitively crafted agreement in give and take that was agreed upon by all parties.

Senator MURKOWSKI. That was a very complete explanation. I am not so sure I understood it all, but nevertheless.

Ms. TROLL. Well, thanks for giving me the chance.

Senator MURKOWSKI. Mr. Finney, can you give us a 30-second answer?

Mr. FINNEY. Well, I was handed a sheet of paper which has the new regulation. I can read it for the record if you would like.

Senator MURKOWSKI. Summarize it, please.

Mr. FINNEY. Yes. It says: "The new regulation will require a 15 meter conditional harvest zone adjacent to the stream and a 15-meter riparian management zone outside of the conditional harvest zone on streams with salmon. No trees will be harvested from the conditional harvest zone unless the operator can demonstrate that harvest will not result in damage to fish habitat.

"For example, if the operator wants to harvest some large trees that may be adjacent to a small stream, it may be permitted by the DNR because a small stream does not require large trees for fish habitat.

"In the outer riparian management zone, harvest of 50 percent of the timber will be permitted as long as the trees that are retained are representative of the size composition of the stand. If these regulations cause the landowner to leave more than five percent of the total volume in the basin, either the width of the riparian management zone must be reduced or the State must compensate the owner for the timber."

Senator MURKOWSKI. Or the State must what?

Mr. FINNEY. Compensate the owner for the timber.

Senator MURKOWSKI. Compensate. So there is certainly an incentive there.

Mr. FINNEY. To leave a minimum, yes, to be forced to leave a minimum amount of material.

Senator MURKOWSKI. Well, it has been an interesting, enlightening little bit.

Mr. Metcalf, you have been aware of this, I guess, inconsistency?

Mr. METCALF. Yes, I think you raise a really good point. While the salmon resources on private land belong to the public, they also need to be taken care of. You know, it has been very difficult to craft a Forest Practices Act that has been effective.

There has been considerable damage done on private land. Fish and Game could document that.

Senator MURKOWSKI. Do they have that documentation?

Mr. METCALF. Yes, that is correct.

Senator MURKOWSKI. Mr. Anderson, do they have that documentation?

Dr. ANDERSON. Yes, they do.

Senator MURKOWSKI. Is it public?

Dr. ANDERSON. It can certainly be made available.

Senator MURKOWSKI. I would request it for the record.

Mr. METCALF. And I think the point of that is that that puts a greater burden on the national forest land to do a better job.

Senator MURKOWSKI. I agree.

Mr. METCALF. I also certainly understand the problem that Goldbelt has. The mainland is a very difficult place to operate, very erodable soils, very steep, V-bottoms, a very difficult place.

There has been on the Chuck River in the Goldbelt logging area, there has been several major landslides. Some of the blowdown has come down.

In talking to Mr. Wilson several weeks ago, he suggested, and I would be really interested to know if he still feels this way, that if the provisions, the buffer strip provisions in H.R. 987 were enacted, it would not be possible for them to log in the Chuck River.

I think that simply shows the difficulty that he is faced with.

Senator MURKOWSKI. Mr. Metcalf, in your testimony you indicated on page 7 that the Forest Service planning alternative is, I think the quote is, is a sham, and that the Forest Service has not prepared a basic forest plan, notwithstanding TLMP, and that Mr. Overbay of the Forest Service's Washington office has scuttled plans for a true TLMP revision.

Am I correct in that?

Mr. METCALF. We talked with the planners in Juneau. They went through what they are going to be able to do with this new plan.

Senator MURKOWSKI. That is correct.

Mr. METCALF. And it is substantially different from what they promised they would do.

Senator MURKOWSKI. How many public meetings did you folks hold around Southeast Alaska to explain your land planning process?

Mr. METCALF. We feel that we are a grassroots organization. We have dealt with a number of organizations and communities. We are represented in most of the communities.

Senator MURKOWSKI. But no public meetings were held to formulate your land planning proposal?

Mr. METCALF. Which land planning proposal?

Senator MURKOWSKI. Well, this one here, your position on the Tongass land management plan.

Mr. METCALF. You mean the set-aside areas?

Senator MURKOWSKI. Yes.

Mr. METCALF. Those were generated by a number of organizations and communities throughout Southeast Alaska.

Senator MURKOWSKI. But organizations, as opposed to the public process, is that right?

Mr. METCALF. We do not have a public process, obviously.

Senator MURKOWSKI. You do not have a public process, okay.

Did you consult with other multiple use resource groups, including the timber industry, in making your land resource allocations?

Mr. METCALF. Perhaps they have consulted with us from time to time.

Senator MURKOWSKI. Well, it is academic, then. The answer is yes?

Mr. METCALF. We have had a number of discussions with them.

Senator MURKOWSKI. What opportunities did SEACC afford the public to change the boundaries on its land proposals?

Mr. METCALF. The land proposals again that we had were generated by——

Senator MURKOWSKI. Did you get review or anything like that? Did you receive comments from the public?

Mr. METCALF. Well, let us look at it this way. If the Forest Service portrays H.R. 987 in the Tongass plan and does a reasonable job of it, that certainly would give the public an opportunity.

But as I said here, I do not think that it is going to be portrayed accurately, and I do not think that the public is going to have an opportunity to even respond if it were allowed to go ahead.

Senator MURKOWSKI. Well, is it not true then that basically the SEACC board did not have the opportunity of public output, or input I should say, from the standpoint of the hearing process and so forth that we ordinarily go through?

So your representative group is a group made up of groups, as opposed to public input?

Mr. **Metcalf**. That is right, that is right, and these groups are well represented in the communities scattered throughout Southeast Alaska. So we feel it is cross-section representation.

Senator **Murkowski**. It is a cross-section, but within a group?

Mr. **Metcalf**. Certainly.

Senator **Murkowski**. In other words, that group has a particular point of view.

Mr. **Metcalf**. We have also identified in there, as they did in the first go-around of the Southeast Conference, that there were a number of areas important to communities, and so there has been community input into that.

Senator **Murkowski**. Through the participating organizations?

Mr. **Metcalf**. That is right.

Senator **Murkowski**. The House of Representatives, it looks to us, pretty much accepted your language without any changes. Is that a fair statement?

Mr. **Metcalf**. I think that is a fair statement.

Senator **Murkowski**. I think you have got some good friends over there.

On page 22, you charge that the problems with the Tongass were created by political dimensions and the failure of the Forest Service to honor its commitments. What political decisions did you have in mind?

Mr. **Metcalf**. Well, I think at the end of ANILCA when Section 705 was crafted, that was certainly a political decision.

Senator **Murkowski**. In what sense?

Mr. **Metcalf**. In the sense that it was done in a room with a number of people who sat down and said: Well, we need to have a mandated timber harvest and we need to have money. That certainly was a political decision. It was not part of any planning process.

Senator **Murkowski**. So you would compare that to the conversations that we have had with the House as far as the environment is concerned? I mean, that is how the process goes.

Mr. **Metcalf**. I do not understand your question.

Senator **Murkowski**. Well, Mr. Miller and I have had several conversations about trying to reach a resolution on this whole thing, and if you are saying that you are critical of the previous political dimension, as you stated on page 22, being the problems of the Tongass created by political dimensions, are we not kind of repeating it?

Mr. **Metcalf**. Yes, I would say that the decision has to be a political decision. The problems were created by political decisions in the first place.

In addition to that, as you pointed out, I said here that the Forest Service has not followed through with its promises, and I wish Senator McClure were still here, but the promises that were laid out in ANILCA and a deal is a deal, I agree with that. A deal is a deal.

But the deal was not followed. There were a number of promises made there, and the only promise that was really upheld was that of providing timber.

Senator MURKOWSKI. The wilderness was obviously upheld, too.

Mr. METCALF. That part was. But the fact is that ANILCA section 8 as far as subsistence, that has not been honored. There was promise of no damage to salmon streams, that obviously has not been honored. Community stability, except for the logging communities, has certainly not been honored.

So I guess the point being that, yes, there were many deals that were made, but they have not been honored.

Senator MURKOWSKI. Well, the parallel which I was going to draw, and it is a leading one, obviously. In your statement you say that the problems of the Tongass were created by political decisions and the failure of the Forest Service to honor its commitments.

We have talked about what those political decisions were. But I think that SEACC in effect is making that same political decision to preempt the land planning process, and that is my own statement. You do not have to answer.

Mr. METCALF. Well, I guess if we had confidence that the land planning process would work, that would be one thing. But given the sideboards, as was mentioned earlier, on this land planning process, there is no chance it could work. So a political decision is necessary in order to even make the course of that planning process meaningful in Southeast Alaska.

Senator MURKOWSKI. Well then, you just hit the stark reality of who has got the strongest lobbyist to dictate the result, which is hardly the way that we would like to do business around here. Maybe it is the way we do business.

Mr. METCALF. Well, we feel our position has a substantial grassroots support in Southeast Alaska. It is a Southeast Alaska problem that has become national in scope.

Senator MURKOWSKI. Yes, but you would acknowledge that it is not a public participating process.

Mr. METCALF. Well, I think these hearings certainly are.

Senator MURKOWSKI. Oh, absolutely. But your own formulation of your own position representing SEACC is hardly public, as you have described it. It is made up of organizations that have similar views as yours, formulating a position.

But now we come to the public process, and how the decisions are made obviously reflects on a political reality that is probably true, but perhaps a bit unfortunate, because unless you can have the input from knowledgeable people who are willing to develop a compromise that I can take, as well as Ted and Don, to my colleagues and say, this is the position of Alaska, it is the position of the Governor, it is the position of the legislature, recognizing that it has to be a compromise, why, we can get somewhere.

But it is pretty difficult to get anywhere in the atmosphere which we are faced with on these highly emotional issues. I am not criticizing anybody for their own point of view or their own stand.

But we have clearly here two things before us: the question of additional wilderness in the Tongass, which is certainly a position that is supported by the SEACC group; and the delicate question of buffer strips, which is one I think we could probably resolve.

But the ability to resolve on additional wilderness is probably one that is going to be very, very difficult to make an accommodation on, and that is unfortunate.

I want to thank you for toughing this out. I think that there was some value in extending the questions particularly into the area of the State and the private Forest Practices Act. I do not know what the professional staff thinks of the reflection on some uniformity ultimately as we address the significant contribution of our fishing industry, but I think that there is room to examine a closer parallel on private and State lands as we address a policy ultimately dictating what we are going to do with Federal lands and buffer strips.

That was something that, very frankly, was not on the agenda, but came out of the conversation.

Does anyone want to make a closing? You do not have to.

[No response.]

Senator MURKOWSKI. I am sure the reporter would be happy to have us adjourn. I do not see anybody jumping up, so I am going to thank you, and I thank you, Mr. Lindh, representing our Governor, Mr. Metcalf, Mr. Griffin, Mr. Finney, Kate, Joe, Mr. Anderson. I thank you all from both sides.

I gather the record will be open. Senator Johnston has asked that the record be held open until this Friday. I understand there are numerous questions that will be addressed to you. I am told you can pick them up right afterward. How is that for service?

Thanks for being with us. This hearing is adjourned. I wish you a good day.

[Whereupon, at 6:13 p.m., the hearing was adjourned.]

APPENDIXES

APPENDIX I

RESPONSES TO ADDITIONAL QUESTIONS

United States Department of Agriculture
Forest Service
Washington Office
12th & Independence SW
P.O. Box 96090
Washington, DC 20090-6090

Reply To: 1510

Date: March 5, 1990

Honorable J. Bennett Johnston
Chairman, Committee on Energy and
Natural Resources
United States Senate
Washington, D.C. 20510

Dear Mr. Chairman:

At the February 26 hearing on H.R. 987, the Tongass Timber Reform Act, you requested the estimated impacts on harvest volume of a buffer prescription of 100 feet on all Class I and those Class II streams flowing into Class I. Our analysis indicates that there is no appreciable difference with regard to Class I streams between our present management prescriptions and the proposed 100-foot no-cut buffer. With regard to Class II streams, our present analysis combines the effects of buffers on Class II and the few Class III streams which are included in the National Marine Fisheries policy. This total equals an additional reduction in acreage of tentatively suitable timber land of 5 percent above our present management prescriptions. We believe that most of the additional 5-percent impact occurs in the Class II streams, but, at this time, we cannot specifically separate the effects by stream class. Approximately 1 week would be required to determine this information.

We were also asked to respond to several written questions. Our responses are enclosed.

Sincerely,

F. DALE ROBERTSON
Chief

Enclosure

Caring for the Land and Serving People

FS-6200-28b(4/88)

Response to Questions
Senate Committee on Energy and Natural Resources
Hearing on Tongass National Forest Legislation
February 26, 1990

Question 1. At page 5 of your testimony, you correctly point out that the original Tongass Land Management Plan (TLMP) was used by Congress for Alaska National Interest Lands Conservation Act (ANILCA) land designations in Southeast Alaska and that TLMP could be used by us now. Could this Committee have the draft TLMP alternatives (including maps) for use in its land proposals and when could you get this to us?

Answer: The draft alternatives including maps can be available by late March 1990. However, we do not have the ability to reproduce large quantities of each alternative map in that time frame.

Question 2. How much money have you spent on TLMP?

Answer:
FY 1987 $ 102,000
FY 1988 $4,384,599 1/
FY 1989 $2,487,893

1/ Includes $2,632,000 GIS costs

Question 3. Describe in detail what you have done with Geographic Informational System (GIS) mapping, etc.?

Answer: We have incorporated resource information including but not limited to recreation, soil, vegetation, scenic quality, subsistence, wetlands, riparian, and fish and wildlife habitat by indicator species, research natural areas, experimental forests, and land status. In addition, we have information such as H.R. 987 wilderness boundaries.

From the inventories, we are able to quickly assess effects on resources by different management scenarios. In conjunction with the National Forest planning model, we are able to address effects of differing land allocations and predict likely attainable outputs associated with any given management scenario.

GIS information will also become increasingly important for site-specific project level planning. These applications, which are already occurring, will serve as the principal long-term use of the GIS system.

Question 4. How many public meetings have you held in Southeast Alaska regarding TLMP?

Answer: Workshops were held in 33 southeast Alaska communities, and in Seattle, Anchorage, and Washington, D.C. In addition, an insert of the public issues was enclosed in seven Southeast Alaska newspapers which are received in over 22,000 homes and businesses.

Question 5. NMFS has proposed 100-foot buffer strips on Class I, Class II, and some Class III streams.

a. What impact would such a policy have on the allowable sale quantity of the Tongass National Forest?

Answer: Based on the assumption that the channels in the current GIS inventory meet the intent of the NMFS policy for Class I, II, and III streams, it is estimated the implementation would reduce the acreage of tentatively suitable timber land by about 5 percent.

b. What additional logging would such a policy incur?

Answer: We assume that the question is what additional logging costs would such a policy incur? If the policy permitted road access through the buffer strips we would expect that additional roading and an increased number of logging settings will be required in some instances. If the policy does not permit road access through the buffer strips, we will virtually be precluded from timber harvest, except by helicopter or other aerial systems that require no road access.

c. What additional benefits to salmonids would result from imposition of National Marine Fisheries Service (NMFS) policy over the riparian management policy you are now following? In other words, compare the detriments of the timber industry with the benefits to the fishing industry of such a proposal.

Answer: No additional benefits to fish would result from imposing 100-foot buffers on any classes of streams. The site-specific field examinations and management prescriptions we now employ are superior to strict fixed buffers. A detriment to timber interests would be the expected loss of about 5 percent of the acreage of tentatively suitable timber land. In addition resource managers would lose vegetation management prerogatives which now enable the realization ". . . of increased primary and secondly production and extended growing season," as quoted from a National Marine Fisheries Service 1986 publication.

An increase in salmon production may be derived from a combination of increased sunlight reaching the stream, increased water temperature, and increased nutrients. If the 100-foot buffer is placed along streams as proposed by NMFS, the opportunity for managing these variables for increased salmon production is eliminated.

Question 6. You have described the Forest Service planning process and the unprecedented public input into the revision of TLMP. How does this differ from the procedures followed in the Southeast Conference report? Did the authors of the Southeast Conference report have the benefit of the professional opinions and public input that your revised plan will produce?

Answer: Not having been directly involved, we cannot say for certain what procedures the Southeast Conference used. In our opinion, the Southeast Conference report represents an attempt at compromise on some of the important issues. We consider the results of the Southeast Conference effort a very important form of public input to the planning process we are conducting.

Question 7. The Southeast Alaska Conservation Council strongly supports 23 areas for wilderness designation. Do you have any idea what criteria they used in selecting these areas?

Answer: We do not have documentation outlining the criteria used by SEACC in selecting the 23 areas for wilderness designation other than as stated in their testimony before this and other Committees of the Congress.

Question 8. At page 5 of its testimony, SEACC says that "over half of the finest and best of the biggest trees have been logged." Does the Forest Service agree or disagree, and what is the basis for your answer?

Answer: We disagree. We are not sure what SEACC means by the "finest and best of the biggest trees" but think they are probably referring to acres that have more than 30 MBF per acre. We have formulated our reply accordingly.

In FY 1952 there were about 800 thousand acres with volume exceeding 30 MBF per acre on the Tongass National Forest. Between FY 1952 and FY 1989, 176 thousand acres have been harvested in that class, leaving a balance of 625 thousand acres or 78 percent still remaining.

Question 9. At page 5 of its testimony, SEACC says that between 1954 and 1988, six indicator species have each already declined by at least 20 percent on the southern half of the Tongass, according to the Ketchikan Pulp Company Forest Service Environmental Impact Statement for the 1989-94 operating period. Does the Forest Service agree or disagree, and what is the basis for your answer?

Answer: The Forest Service disagrees. SEACC has misrepresented the information. The figures in the FEIS for Ketchikan Pulp Company (KPC)represent reductions in habitat only, not necessarily population. In addition to habitat, wildlife populations are influenced by food availability, hunting, predation, trapping, etc. Changes in habitat do not translate directly to changes in population. Further, habitat capability is not an animal count or population census.

Question 10. At page 5 of its testimony, SEACC says the KPC 1989-94 FEIS shows the following declines by 2054:

Bald eagles	56 percent
Sitka Black-tailed deer	58 percent
Pine martin	59 percent
Black bear	39 percent
River otters	45 percent
Hairy woodpeckers	69 percent

Does the Forest Service agree or disagree, and why?

Answer: We disagree, as discussed in the answer to the previous question, habitat changes do not translate directly to changes in population. However, we acknowledge that timber harvest changes wildlife habitat. Site and vegetation changes result from timber harvest; therefore, habitat capability changes for some wildlife species.

Question 11. At page 5 of their testimony, SEACC says that "the vast majority of wilderness designated in the Tongass by the 1980 Alaska Lands Act was rock, ice, scrub timber, or marginal forest lands." Does the Forest Service agree or disagree, and why? How much commercial forest land is in wilderness and how much is scheduled for harvest during the 100-year rotation period? Does the Forest Service consider this a balance?

Answer: We disagree with the statement that the vast majority of wilderness designated is rock, ice, scrub timber, or marginal forest lands. The 5.4 million acres designated wilderness are comprised of:

3 million acres (54 percent) are forested. Of that, 1.5 million acres are classified commercial forest land and 1.5 million are noncommercial forest land.

0.8 million acres (16 percent) are non-forest (beach, muskeg, rivers, streams, lakes, and landslides).

0.8 million acres (15 percent) are rock.

0.6 million acres (11 percent) are ice and snow.

0.2 million acres (4 percent) are alpine.

None of the 1.5 million acres of commercial forest land within wilderness is scheduled for harvest during the 100-year rotation period.

The broad variety of land forms and vegetation in the Tongass are represented within the designated wilderness. There is at least one designated wilderness within each geographic province on the Tongass. They contain a wide range of ecosystems and types of geology including ocean bound Pacific islands, unique glacial geology, complete land bodies with the full range of vertical ecosystems, major rivers of international significance, and areas of high energy marine-coastal land interface.

Question 12. At page 2 of its testimony, SEACC says that since the Forest Service AMS shows an allowable sale quantity of 580 million board feet, even after SEACC's land proposals, 464 million board feet would be left for timber harvest. Does the Forest Service agree or disagree with these figures, and why?

Answer: We disagree. We assume SEACC is referring to the Maximum Present Net Value Benchmark showing an allowable sale quantity of 580 MMBF. A benchmark is not an alternative. It merely serves to show that if the Forest was managed for maximizing present net value, the Forest could produce 580 MMBF. We are not aware of the basis of the remaining volume they predict, but we do not believe it accurately reflects a realistic management alternative. Within SEACC's Wilderness Proposals, we do know that there are about 700,000 acres of commercial forest land which is currently included in the timber base for purposes of calculating the allowable sale quantity for the Tongass.

There is much more to developing an ASQ for management of a National Forest than merely subtracting the volume attributed to a series of land units from the volume determined through the Maximum Economic Benchmark. We believe that such a volume can only be determined through the process outlined by Congress in the National Forest Management Act.

Question 13. At page 2 of its testimony, SEACC says that the Forest Service has claimed that the House buffer strip proposal would reduce the allowable sale quantity by 20 percent and that the Forest Service claim was "a deliberate effort to misconstrue House intentions." Does the Forest Service agree or disagree, and why?

Answer: We disagree. Our statements with regard to the effects of mandating a 100-foot buffer were made first in reference to a reduction in acreage of the tentatively suitable timber land, not volume, and include:

Present Forest Service Streamside Prescriptions	5 percent
National Marine Fisheries Service Policy	10 percent
HR 987 language1/	25-35 percent

1/ Minimum of 100 feet in width on each side of all anadromous fish streams and their tributaries except those tributaries with no resident fish populations which are intermittent in flow or have flow of inadequate magnitude to directly influence downstream fish habitat.

Question 14. At page 8 of its testimony, SEACC makes various allegations about the Forest Service planning process:

a. Is the 1979 TLMP a "true NFMA Forest Plan"?

Answer: Yes. The Forest Service regards the TLMP, which was completed in March 1979, as a Forest Plan under NFMA.

b. Mr. Overbay is charged with directing "TLMP planners to scuttle plans for a comprehensive meaningful TLMP revision." Is Mr. Overbay trying to scuttle the TLMP revision process, and if not, how do you explain Attachments I and J to SEACC's testimony?

Answer: Deputy Chief Overbay has not acted to "scuttle" the revision process of the Tongass Land Management Plan. His letter of February 6, 1989 (SEACC Attachment I), does not address revisions. His letter of August 1, 1989 (SEACC Attachment J), provides advice about how to conduct Forest Plan revisions.

In his February 6, 1989, letter (SEACC attachment I), Mr. Overbay provides important direction on Forest Plan implementation procedures to all Regional Foresters. In this letter, there is no mention of the Tongass Land Management Plan revision or direction for the revision process as it may apply elsewhere.

In responding to a Regional request for advice, his August 1, 1989, letter clarifies the differences between the development of a Forest Plan and the revision of the plan. It advises that revision processes should focus on "the need for change" in the management direction of the existing plan and should not replicate the protracted "zero-based" planning that typified the development of initial Forest Plans. It also clarifies how a critical step in the revision process, the determination of the need to change the management direction, should be handled. This clarification served to focus the TLMP revision process on the direction of the existing plan which needs to be changed, rather than all the other direction of TLMP which is still relevant and applicable.

c. Mr. Barton, the Regional Forester is accused by SEACC of forcing "unprecedented short deadlines that obviate meaningful professional planning." How does the Forest Service respond to that charge?

Answer: We are working on a very tight schedule. But we believe the professional quality of our planning to date is evident in the work we have produced, including the summary document entitled "Understanding the Past . . . Designing the Future." It has been well-received by most members of the public, and is backed up by a comprehensive and detailed technical document.

Up until the end of last year, the interdisciplinary team has largely been in a "building mode" of operation. Now that the needed data is available and the forest planning model that the team is using for analysis is operational, the team is now in an accelerated "production mode" in order to complete the remaining revision process steps in a timely fashion.

Question 15. At page 9 of its testimony, SEACC says that the TLMP Revision will be less site-specific than the existing TLMP because the Forest Service will have "geozones" of 370,000 acres instead of Valued (sic) Comparison Units. How does the Forest Service respond to this charge?

Answer: We disagree. Analysis in the Revision of the existing Forest Plan will be more site-specific than the existing TLMP for three reasons: (1) The basic unit of data collection and analysis of resource values in the existing TLMP was a Value Comparison Unit (VCU). These land units, averaging approximately 18,000 acres, were analyzed for their relative value for each resource including timber, recreation, fish, and wildlife. The basic land unit for data collection in the revision is a forest-wide grid of 890,000 twenty-acre cells. This basic land unit is 1/1000 the size of the land area at which resource values were assessed in the existing Forest Plan. (2) The 18,000 acre VCU's were allocated in entirety to one of only four possible Land Use Designations (LUD's) in the existing plan. The Forest Plan revision will allocate each 20-acre cell to one of 24 possible Management Areas. This will create a much more site-specific land allocation pattern. (3) Timber harvest scheduling was done in the existing Plan using combinations of soil productivity and timber strata contained in each of the three administrative areas on the Forest. Timber harvest scheduling in the revision will be done for each combination of 50 geographic zones, timber operability class, soil productivity, timber strata, recreation place, and riparian zone.

Question 16. At page 9 of its testimony, SEACC charges that "the quality of the timber maps in the GIS is so poor that GIS maps and analysis are unreliable." How do you respond to this charge, and the charge at pages 9 and 10 that your own specialists found the timber base date inaccurate?

Answer: SEACC is misinterpreting Brickell's report. We asked Mr. Brickell to see if that data could be adapted in conjunction with other information to provide more site-specific data. Brickell says the inventories are adequate for an assessment of forest areas and volumes at the Forest level but that the timber estimates for specific smaller areas of land cannot be done with any reasonable precision.

The Forest inventories for the Tongass were conducted and accomplished to meet prescribed standards for timber inventories on National Forest System lands. The inventories for the Tongass meet those standards. Therefore, they are adequate for calculating timber yields and the allowable sale quantity for the Forest Plan.

The timber on the Tongass is for the most part composed of old growth stands. These stands are not homogeneous. Individual stands vary considerably from each other, although collectively they may have very similar characteristics such as volume per acre. Those stands with similar characteristics as to volume per acre are displayed in our timber type maps, but the individual stands comprising that type may vary from the type as a whole.

The forest inventory was not designed to locate within a timber type each stand that comprises that timber type. That fine degree of information is gathered when cruises for individual sales are done. We can, however use the data and data collected in other resource inventories to predict the effects of changes caused by timber harvest. Therefore we believe that we can make appropriate effects analyses, including economics, to make the necessary decisions required for Forest Plans. Site specific analyses for projects under the forest plans will require more data to determine the specific effects of projects.

Question 17. How do you respond to SEACC's charge at pages 10-13 that volume class information is so inaccurate that the GIS timber maps will "result in inaccurate economic analysis"?

Answer: We disagree with SEACC's characterization. Different timber types have different economic value because of species composition, size of timber, accessibility, and other factors. Our information is adequate for making the analyses at the Forest Plan level. Additional information will be required to analyze individual projects and will be obtained at the time needed.

Question 18. How do you respond to SEACC's charge at page 13 of its testimony that the "Forest Service has scuttled its commitment to a comprehensive assessment of subsistence resource needs as part of the TLMP revision"? How do you respond to Sealaska's subsistence complaints cited at pages 13-14 of its testimony?

Answer: The Forest Service has not scuttled its commitment to subsistence. The TLMP Revision alternatives will respond to the subsistence evaluation provisions found in ANILCA Section 810, and being a long range plan, will evaluate future cumulative effects as part of the NEPA process. The TLMP revision will incorporate subsistence information from the following sources. The Forest Service, in cooperation with the Alaska Department of Fish and Game (ADF&G) and the University of Alaska, has developed the most comprehensive data base on Southeast Alaska rural subsistence uses found anywhere in the State. Secondly, the revision will utilize information from previous Forest Service studies and NEPA documents, community and resource specific subsistence studies from ADF&G and discussions with Native Corporations. Finally, the Tongass Resource Use Cooperative Survey (TRUCS) sampled 30 communities and conducted 1,465 household interviews to establish a site-specific base of information and maps on subsistence uses for the TLMP Revision and for future site specific project level planning.

The Revision will address subsistence in terms of abundance, access, and competition for the resources that the habitat is capable of producing. In addition, the ADF&G will be providing the TRUCS information to the Boards of Fisheries and Game to assist them in making regulations and determining allocation priority for stocks of fish and populations of game. The Forest Service as a habitat manager relies on the State to regulate and allocate the priority for harvest of fish and game as has been their traditional role.

Question 19. At page 14, SEACC alleges that the Forest Service is "covering up the impacts of logging on wildlife." How do you respond to this charge set forth with charts from pages 15-8 of SEACC's testimony?

Answer: The publication "Understanding the Past . . . Designing the Future" shows the effects and estimates of forest-wide habitat capability after 10/50/150 years and this is based on wildlife habitat capability model runs for the individual management indicator species. The publication estimates potential changes only in habitat capability and not in actual numbers. The charts enclosed with question 19 represent results from our individual species model runs. These data were aggregated to make the wildlife habitat capability estimates on page 59 of the publication ("Understanding the Past . . . Designing the Future"). We did not display the results of these individual species runs in that document, but this information is in our planning record. The charts enclosed with SEACC question 19 should be labeled habitat capability expressed in terms of numbers of animals.

Question 20. At page 19 of its testimony, SEACC charges that "the Forest Service is misleading the public with regard to salmon production and logging on the Tongass National Forest." For example, SEACC says that the Tongass, salmon production will increase 10 percent," and that this claim is "patently false." Is the Forest Service making "patently false claims" to the public? Please respond.

Answer: The Forest Service is not making "patently false claims" to the public. We've been a leader both in continual research and study of the aquatic habitat relationships, and also in implementing the latest findings. Our current direction is to maintain or enhance the productive capability of anadromous streams. The data available readily supports the adequacy of protective measures. The management prescriptions which have been developed for the revision of TLMP define the needed practices. Our project implementation procedures have undergone detailed internal and interagency scrutiny during the past years and are greatly improved.

Our prediction that salmon production could increase by as much as 10 percent results from our experience with our extremely successful enhancement projects. We have increased production potential on an annual basis by around 8 million pounds in the past decade, and we are rapidly implementing projects which will add even more salmon to the catch of commercial and sports fisheries. Many of these enhancement projects are undertaken with a variety of partners, including the Alaska Department of Fish and Game, regional aquaculture associations, the timber industry, and many others.

Question 21. Regarding buffers strips, SEACC says at pages 21-22 of its testimony that the Forest Service does not have enough biologists to monitor its site-specific riparian management program and that the prescriptive buffer strip approach is better because it is "simple, enforceable, and based on existing verifiable maps and information." Please respond to SEACC's charge.

Answer: As we mentioned at the hearing on February 26, the Forest Service has 25 professional fisheries biologists on the Tongass National Forest with three to five additional biologists presently being recruited. The experience levels range from 1 to 15 years, supplying a blend of experience and fresh ideas. All are well-qualified. We believe these biologists combined with the wide variety of other disciplines essential to good management provide the necessary expertise to manage the riparian habitat.

Question 22. At page 22 of its testimony, SEACC states that "the problems of the Tongass were created by political decision and the failure of the Forest Service to honor its commitments." How do you respond to this charge by your former employee, Mr. Metcalf of SEACC?

Answer: We do not know what commitments Mr. Metcalf is referring to.

Question 23. Regional Forester Barton, on page 3 of the United Fisherman's Association's testimony, Ms. Troll says that the Forest Service is not implementing present standards on Prince of Wales island. Can you respond to this?

Answer: The Forest Service disagrees with the allegation made by Ms. Troll. We are currently implementing state-of-the-art management prescriptions for protection of fisheries habitat and water quality on Prince of Wales Island and throughout the Tongass.

UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
Washington, D.C. 20230
OFFICE OF LEGISLATIVE AFFAIRS

March 7, 1990

Honorable J. Bennett Johnston
Chairman, Committee on Energy and
  Natural Resources
United States Senate
Washington, D.C. 20510-1802

Dear Mr. Chairman:

Enclosed are responses to questions submitted to Dr. James Brooks, National Marine Fisheries Service, by Senators McClure and Wallop in followup to the February 26, 1990 hearing by the Subcommittee on Public Lands, National Parks and Forests, on the Tongass Timber Reform Act, H.R. 987.

If you, or your colleagues, have any further questions, please let me know.

Sincerely,

Cliff

Lori Gribbin for
Director

Enclosure

NATIONAL MARINE FISHERIES SERVICE
RESPONSES TO QUESTIONS SUBMITTED BY
SENATORS JAMES A. McCLURE AND MALCOLM WALLOP
TO THE NATIONAL MARINE FISHERIES SERVICE
IN FOLLOWUP TO THE HEARING BY THE
SENATE SUBCOMMITTEE ON PUBLIC LANDS, NATIONAL PARKS AND FORESTS
COMMITTEE ON ENERGY AND NATURAL RESOURCES
ON
THE TONGASS TIMBER REFORM ACT
February 26, 1990

1. **Prior to becoming Deputy Director of the Alaska Region of the National Marine Fisheries Service (NMFS), weren't you the Commissioner of the Alaska Department of Fish and Game (ADF&G)?**

   Yes.

2. **In that capacity, did you, or did ADF&G advocate 100-foot buffer strips on Class I, Class II, and some Class III streams?**

   No. At the time ADF&G just recommended the retention of buffer strips.

3. **In fact, weren't you advocating the necessity of keeping all woody debris (large and small) out of such streams and the hand-cleaning of such streams to remove Large Woody Debris where it had gone into those streams during timber sales?**

   No. We only encouraged the removal of excessive debris introduced into streams by logging activities.

4. **Would you say that Forest Service attention to riparian management has improved or gotten worse in the period since you were Commissioner?**

   In general, it has improved.

5. **If Forest Service riparian management is better now than before and you weren't advocating mandatory prescriptive buffer strips then (in fact, you were doing the opposite by removing Large Woody Debris), why do we need such prescriptions now?**

   As stated under question 3 above, we only encouraged the removal of excessive debris from logging activities. Since that time extensive research conducted by NMFS and others has indicated that the retention of a minimum of 100 foot buffer zones or strips along certain streams is necessary to protect anadromous resources.

6. **Isn't it likely then that more research would provide new means of mitigating impacts of timber harvest in the riparian zone?**

In our opinion, no. Additional research currently available from other areas and any done in the future will likely reinforce NMFS's policy on minimum 100-foot buffer zones.

7. **On the first page of your testimony, you point out that NMFS "shares Federal responsibility for the conservation and management of anadromous fish." These are salmonids that populate Class I streams, right?**

Yes, as indicated in our testimony, Class I streams are defined as any natural freshwater body of water (including lakes and ponds) containing anadromous fish or eggs or high value resident sport fish or with habitat having reasonable enhancement opportunities for anadromous fish. However, as indicated in question number 8 below, NMFS has legitimate concerns with the management of Class II and Class III streams also.

8. **Yet your policy statement suggests that the Forest Service prescribe mandatory buffer strips on Class II and some Class III streams as well as Class I streams. Aren't Class II and Class III streams beyond NMFS jurisdiction, and if so, why are you trying to tell the Forest Service what to do on those streams?**

Class II and Class III streams are not beyond NMFS' authority concerning anadromous resources. Under Reorganization Plan Number 4 of 1970 and the Magnuson Fishery Conservation and Management Act, NMFS has management authority over all anadromous species throughout their migratory range (16 U.S.C. § 1811(b)). Our research has shown that physical and chemical alterations to certain Class II and Class III streams directly influence the habitat quality of the anadromous streams into which they flow. Therefore, alterations to Class II and Class III streams are clearly within NMFS' purview.

9. As I understand it, Congress has ordered the Forest Service to manage riparian habitat as follows under Section 6(g)(1)(E) of NFMA:

> **Insure that timber will be harvested from National Forest System lands only where protection is provided for streams, wetlands, and other bodies of water from detrimental changes in water temperatures, blockages of water courses, and deposits of sediment, where harvests are likely to seriously and adversely affect water conditions of fish habitat.**

36 CFR Section 219.27 requires:

> **Special attention shall be given to land and vegetation for approximately 100 feet from the edges of all perennial streams. No management practices causing detrimental changes in the water temperatures or chemical composition, blockage of water course, or deposits of sediment shall be permitted.**

The National Riparian Policy orders the Forest Service to:

> **Manage riparian areas under the principles of multiple use and sustained-yield, while emphasizing protection and improvement of soil, water, vegetation, and fish and wildlife resources; give preferential consideration to riparian-dependent resources when conflicts among land use activities occur.**

Dr. Brooks, do you consider this a good statement of riparian management policy? If not, why not?

NMFS considers the National Riparian Policy an adequate statement of general policy through which specific techniques, such as buffer strips, may be required to protect specific resources in specific areas. In our opinion, studies have shown that a minimum of 100 feet is always required to protect fishery resources. Thus, the use of minimum 100-foot buffer strips in Alaska, as advocated by NMFS' policy, would manage riparian areas for "multiple use and sustained-yield" as indicated in the National Riparian Policy. Additionally, NMFS' policy meets the National Riparian Policy's suggestion that "preferential consideration" be given to "riparian-dependent resources when conflicts among land use activities occur." Fishery resources are riparian-dependent resources.

We believe, however, the policy should also address the need for adequate monitoring of the Forest Service's (USFS) riparian management activities to address any adverse effects on fishery resources.

10. **If not, then, if I understand it, NMFS is proposing a change in Section 6 of the National Forest Management Act (NFMA) to require prescribed buffer strips? How will this affect riparian management in Idaho?**

If so, the above policy I quoted, of course says nothing about buffer strips. So, if I understand your last answer, buffer strips are not necessary to meet national riparian policy?

NMFS' buffer-strip policy does not propose modification of Section 6 of the National Forest Management Act. The policy states that, in Alaska, NMFS advocates the retention of minimum 100-foot buffer strips along anadromous streams and their tributaries to maintain fishery production. The NMFS' policy is specific to Alaska and is based on extensive research in Alaska. The policy does not address riparian management in Idaho.

The possible inclusion of mandatory buffer strips in the National Riparian management Policy has not been addressed by NMFS.

11. **If your answer is "adequate" to Question 9, is the problem that the Forest Service in Region 10 is not following the national riparian habitat requirements, and if so, in what ways are they not following it?**

We believe that additional monitoring is necessary to address the USFS's riparian management activities and any adverse effects on fishery resources.

12. **Region 10 of the Forest Service has produced an Aquatic Habitat Management unit (AHMU) Handbook describing how riparian habitat is to be managed on the Tongass. Have you seen it? Have you also seen the Region 10 Brochure describing AHMU?**

At page 11, the brochure says:

The Forest Service approach is to custom-design protection and management measures specific to each stream site using inter-disciplinary teams consisting of: fish and wildlife biologists, hydrologists, soil scientists, foresters and engineers. The Forest Service believes this to be the best professional approach for achieving the objectives of the National Forest Management Act, and resource management goals in the Tongass Land Management Plan.

Do you agree with the Forest Service?

NMFS assisted the USFS in their preparation of the AHMU Handbook; however, NMFS has never endorsed the Handbook as the way to manage fish habitat. NMFS has seen the Region 10 brochure describing the AHMU. We agree that theoretically the best way to manage riparian habitat is through site-specific prescriptions; however, we believe that such prescriptions are not always practical (see attached December 13, 1989 letter from John A. Knauss, Under Secretary, U.S. Department of Commerce, to F. Dale Robertson, Chief of the USFS). However, as we stated before, protection and management may still be custom-designed in each case because NMFS believes that the 100 foot buffer strip is only a minimum.

13. **If so, then why do we need prescribed buffer strips? Can't we achieve the same result through the Forest Service policy with which you just said you agreed?**

If not, I have a December 13, 1989 letter from John A. Knauss, Under Secretary of the Department of Commerce to Dale Robertson, Chief of the Forest Service. It appears to say that NMFS agrees that site-specific management is best, but doesn't trust the Forest Service to implement it:

"Your letter states that the Forest Service 'requires a no harvest buffer zone along streams when needed to maintain or enhance fish habitat and maintain water quality; the width of the buffer to be dependent on the on-site conditions. The NMFS agrees that site-specific evaluations are theoretically the best way to manage streamside zones. In reality, however, the Forest Service policy has failed because it is too complex and relies on too many people variously interpreting Forest Service guidance to protect riparian vegetation."

Dr. Brooks, doesn't this letter agree that site specific management is best?

While site-specific management may theoretically be best, we believe that the USFS has not been able to satisfactorily apply site-specific prescriptions to protect fish habitat. We believe that a required minimum 100-foot zone would ensure this protection. Site-specific management is still required to determine if wider zones are needed to protect fish habitat, to determine whether a stream is a Class I, II, or III, to determine which Class III streams need minimum 100-foot buffers, and to determine appropriate best management practices for sites not requiring buffers.

14. **On what basis does NMFS not trust the Forest Service to do an adequate job enforcing its own policy?**

The basic question here is not whether NMFS trusts the USFS. Rather, it is a question of what is practical and effective for protecting anadromous resources in Alaska. We do not believe that it is practical to prescribe site-specific buffers along all anadromous streams and their tributaries in the Tongass. Also, it does not seem possible to monitor adequately the myriad of resulting prescriptions for their effect on anadromous fish and their habitat. In our view, our research has shown that 100-foot buffer strips are the minimum necessary to protect adequately anadromous resources from the adverse effects of logging. In some cases, larger buffers may be necessary and could be determined on a site-specific basis.

15. **At pages 1 and 2 of your testimony, you cite extensive research documenting the need for the 100-foot buffer strip policy, right.**

This is referred to on page 2 of our testimony.

16. **But isn't it a fact that in response to a February 8, 1990, Freedom of Information Act (FOIA) request for such research, you produced only an 11-page 1986 article which appeared in the Canadian Journal of Fisheries and an article accepted for publication but not yet published?**

The February 8, 1990, FOIA request to which you refer did not request information on NMFS' buffer-strip policy (attached).. Instead, it requested only "all 'research' conducted by NMFS referred to in the January 5, 1990, letter" to Michael A. Barton (emphasis added). The two documents supplied were the only two referred to in the letter.

17. **Isn't it misleading then to claim extensive research in this area?**

NMFS buffer-strip policy is based on extensive research, six primary studies are cited in the policy itself (a copy of the policy is attached). In total, information from over 20 studies relates to the policy. We would be glad to supply a detailed bibliography of these studies to the Subcommittee.

18. **At page 2 of your testimony, you claim to have worked closely with the Forest Service in this area. Yet I note that in a September 15, 1989 letter to John Knauss, the Chief of the Forest Service invites "increased participation of NMFS in the field evaluations and analyses associated with selecting management prescriptions for streamside zones and in follow-up evaluations to check whether the expected results were achieved following project completion"?**

Are you people really getting out on the ground and looking at what the Forest Service is doing, or do you want this buffer strip policy because you have insufficient personnel to get out and monitor these activities?

As indicated in our December 13, 1989, response to the USFS, NMFS Alaska personnel have spent a considerable amount of time working with USFS personnel. NMFS and USFS personnel have been involved in the development of the Southeast Area Guide, Tongass Land Management Plans, Southeast Alaska Multiresource Model, Aquatic Habitat Management Handbook, and other planning and guidance materials. Our biologists also spend a great amount of time in the field. However, much like the FS, we have limits to the area we can cover and adequately monitor.

19. **So the real problem is that you don't trust the Forest Service. Since you can't monitor the Fores [sic] Service Streamside management, you want prescriptions, right?**

See response to question number 14.

20. **At page 3 and 4 of your testimony, you justify the 100-foot buffer strips by pointing to the need to recruit Large Woody Debris (LWD) into streams, right?**

Yes. Large woody debris is one of several important factors that a minimum 100-foot buffer zone would protect.

21. **Am I right that Large Woody Debris recruitment and stream temperature are the main reasons for the buffer strip policy?**

No. Large woody debris (LWD) and stream temperature are essential to fish habitat and were used as determinants of NMFS's buffer zone policy; however, there are several other important factors in maintaining fish habitat including shade and cover, streambank stability (i.e., undercut banks), preventing erosion and sedimentation, adequate sunlight, nutrient cycling, and tempering of floods from rain or snow events. These factors are for the most part also protected by the minimum 100-foot zone that ensures recruitment of large woody debris and that emulates temperature regimes and shade found in the riparian zone in old-growth forests. Simply keeping logging debris and equipment out of and away from the stream prevents much physical disturbance of the stream and habitat.

22. **Am I also right that nearly 50% of Large Woody Debris comes from within one meter (three feet) of a stream's bank, two-thirds of Large Woody Debris comes from within five meters (15 feet) and 83% comes from within 33 feet?**

Yes. However, these are average values. Some LWD comes as far away as 40 meters from the bank. In the valley bottom streams, much of the LWD comes from the lower bank (46-64 %) because these streams generally meander across their flood plains, and their channels may change direction and follow new courses. These streams will generally require zones wider than 100 feet to allow for stream meandering and still provide adequate recruitment over the long term of LWD following logging. In some of the mid- and high-slope streams, only 19-23 % of LWD comes from the lower bank. Overall, in order to protect future sources of LWD for streams important to fishery resources, 100 feet is a minimum. Any less would cause a loss of fish habitat. As stated earlier, buffers help protect stream banks from erosion, maintain water quality, provide shade and cover for the stream, and moderate stream temperature, etc.

23. **So streams are not necessarily going to be damaged if there are buffer strips less than 100 feet-- all it means is a probability that such a stream will not naturally recruit 100% if the Large Woody Debris it would otherwise get, right?**

As Dr. Brooks stated during the hearing, "we believe that long-term degradation of salmon habitat is certain" without minimum 100 foot buffers.

24. **Could the Forest Service make up for loss of Large Woody Debris within 100 feet by artificially inducting it into a stream?
I understand that the ADF&G is having private (Native) corporations put logs into the water for Large Woody Debris purposes.**

From a scientific standpoint, we currently do not know how to add large woody debris to higher gradient streams typical of Alaska and the Pacific Northwest so that it will be stable, functional, and last for many (up to 200) years. Because of the large amount of wood needed and the required distribution throughout the stream, it would most likely be cost prohibitive. Some evaluations of adding LWD to streams are being made, but the results have been inconclusive. The USFS is adding LWD to streams and ADF&G may be recommending such action.

25. **At page 4 of your testimony, you cite the losses of Large Woody Debris recruitment "if these streams are logged down to the stream bank without leaving any buffer on the Class I streams over which you have jurisdiction? [sic].**

A statement similar to this is made on page 4 of our testimony.

26. **In fact, didn't Mr. Reed from ADF&G compliment the Forest Service for its use of buffer strips on Class I streams in the Alaska Pulp Company 1986-1990 Forest Service Environmental Impact Statement in a December 13, 1989 letter?**

We have not seen Mr. Reed's letter of December 13, 1989, complimenting the USFS on its use of buffers. We have, however, seen a letter from Don Cornelius and Jack Gustafson through Rick Reed to Frank Rue, Director of Habitat, ADF&G on September 14, 1989. This letter documents a field trip to Prince of Wales Island with USFS staff to inspect USFS activities in the KPC Long-Term Sale with primary focus upon riparian management activities. They found significant effects of logging on fishery resources within only a small portion of the Long-Term Sale Area. The letter stated "Presuming the same problems exist throughout the sale area, we must assume that considerable impacts to fish and wildlife habitat are occurring as a result of the Long-Term Sales and associated 'salvage' sales on Prince of Wales Island" (letter attached).

27. **So your real quarrel with the Forest Service is that it applies less than a 100-foot buffer on some Class I streams through use of a site-specific Interdisciplinary Team approach which NMFS doesn't trust?**

NMFS supports the USFS' approach of using Interdisciplinary Teams (IDTs). However, NMFS believes that it is the USFS responsibility to assure that the riparian habitat will be managed using the best scientific information provided by IDTs to protect the extremely important and valuable anadromous salmon habitat found in the Tongass National Forest. The minimum 100-foot buffer policy of NMFS incorporates that information.

28. **If you do not agree, in reference to the December 27, 1989 letter from NMFS Alaska Director Pennoyer to Mike Barton, didn't NMFS complain that while buffer strips were used on Class I streams, that some of the buffers were less than 100 feet?**

Again, this just means that less then 100% of Large Woody Debris will be naturally recruited into those streams, it does not mean they will be damaged, right?

As stated in the referenced letter of December 27, 1989, NMFS objects to the USFS plans to harvest timber next to anadromous streams using buffer strips less than 100 feet. Over time, LWD is lost from streams. If no buffers are left, this LWD is not replaced causing damage to fishery

resources.

29. **At page 5 of your testimony, you point to the NMFS buffer strip policy as necessary to prevent sedimentation. But isn't it true that the key to protecting against sedimentation is maintaining an adequate ground cover and proper road standards? So if an adequate ground cover and streambank integrity are maintained, timber harvesting can occur within the 100-foot riparian zone without undue stream sedimentation?**

Buffer zones are extremely important in protecting stream banks from physical disturbance, and in maintaining vegetation with live root systems to keep the stream banks from collapsing. Erosion, sedimentation and loss of undercut banks from inadequately protected stream banks are a major source of habitat loss. Root systems from an individual tree may extend 30 feet and are responsible for the stability of the riparian zone. It is unrealistic to think that the ground cover and stream bank integrity could be maintained within the 100-foot riparian zone if logging were allowed in the zone.

30. **Are any studies available, or has research been conducted, that show current management practices have decreased fish runs and tons of fish caught?**

It would be nearly impossible to evaluate current logging practices by assessing changes in fish abundance. The life cycle of some species such as coho salmon may be as long as 5 years and the abundance of returning adults for several complete life cycles before and after logging would be required (30 - 50 years). In addition the natural variability in abundance of fish populations would preclude detecting a change unless it were catastrophic. There are no studies in the Tongass looking at this issue of which we are aware.

31. **Prior to logging (1983), 8 million fish per year were caught. Recent statistics show that 30 million fish are now caught per year, representing a four-fold increase. How do you explain the recent record fish runs?**

In our opinion, the increase in commercial salmon catch in southeast Alaska in recent years was largely a result of very favorable climatic conditions which has increased survival of the different life stages both in freshwater and marine environments. If all freshwater habitats in southeast Alaska were at optimum habitat capability, we would expect far greater returns. However, we suspect there has been a reduction in abundance of some stocks due to logging activities.

32. **Can you provide specific examples which show that existing Forest Service policies are detrimental or have resulted in a loss of fish?**

One of our research studies on the Tongass National Forest (Murphy et. al.,1986) documents the loss of juvenile salmonid habitat by clear-cutting to the stream bank without the use of buffer zones. Clear-cutting reduced winter carrying capacity for salmonid parr by removing large woody debris, collapsing undercut banks, and destabilizing or embedding channel substrate. In the same study, buffer zones protected habitat and provided a source for additional new debris after logging. Additional papers on different aspects of the above paper all reach basically the same conclusion (Thedinga et al., 1989; Heifetz et al., 1986; and

Johnson et al., 1986). Elliott (1986) assessed the effects of an experimental removal of all woody debris in Starrigavin Creek near Sitka. He found an 80 % reduction in the Dolly Varden population a year after debris removal, demonstrating the importance of large woody debris to stream structure and habitat. Bryant (1980) documented the extensive changes in the stream channel of Maybeso Creek caused by timber harvest operations and the effects on woody debris accumulations. Forest management activities (roading and timber harvest) directly alter debris loading by addition or removal of material and by indirectly increasing debris torrents and removing standing streamside trees (Swanston and Swanson, 1976). Many other studies since the mid-1950's have shown significant changes in fish habitat. A detailed bibliography and copies of specific studies can be supplied upon request.

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March 2, 1990

The Honorable Bennett Johnston, Chairman
Energy and Natural Resources Committee
U.S. Senate
Washington, DC 20510

Dear Senator Johnston:

As requested, we are providing our responses to questions you asked during the February 26th Tongass hearing, as well as making some clarifications to statements made by others during the hearing. Additionally, we are attaching our responses to the written questions from Senators McClure and Wallop.

You asked: What impact would permanent protection of lands have on the Tongass timber supply and Tongass-dependent timber jobs?

Since 1980, the average annual harvest from the Tongass has been 295 million board feet. In the high timber demand years of 1988 and 1989 the harvest was 331.5 and 377 million board feet, respectively. Because the 1980s encompass a complete market cycle for Tongass timber, from lows to highs, the average annual cut for this decade is a good, realistic expression of timber demand.

Based on the above Forest Service figures, SEACC believes H.R. 987 would have no impact on existing Tongass-dependent timber jobs.

H.R. 987 would reduce the current available timber supply by 13-14% -- from 450 down to 390 million board feet per year (using Forest Service figures). Permanent protection of all 23 proposed areas, plus the Salmon Bay Lake watershed, would be an annual reduction of 50 million board feet. The mandatory 100' buffer strips would be another 10 million board foot reduction annually. This leaves still leaves 13 million more board feet per year than was harvested in the banner year of 1989, and 95 million more than the decade long average. This does not take into account that the Forest Service is free to release LUD II timber into the scheduled timber base, via the TLMP revision process.

The State of Alaska position (also the original Southeast Conference position) for permanent lands protection would reduce the annual currently available timber supply by 23-28 million board feet. The State's position calls for 100' buffers on Class I streams only, an impact of 4%, but since the Forest Service says it already practices this there would be no further impact on the available timber supply. Thus, 422-427 million board feet of timber per year would be available under the State's position.

We must note here some misleading statements made by Don Finney of the Alaska Loggers Association. Mr. Finney's statement that the 1989 harvest was 420 million board feet is misleading because this figure includes utility logs in addition to sawlogs. The 450 timber supply goal is calculated on a sawlog basis only -- the 1989 sawlog harvest was 377 million board feet.

Mr. Finney further claimed that H.R. 987 would have a 77 million board foot per year impact on the ASQ. To arrive at this misleading figure, Finney included LUD IIs and LUD I Release areas that are not currently in the scheduled timber supply. The impact on the current scheduled timber supply is 50 million board feet annually.

PELICAN FORESTRY COUNCIL * FRIENDS OF BERNERS BAY, Juneau * WRANGELL RESOURCE COUNCIL * SITKA CONSERVATION SOCIETY
FALSE ISLAND·KOOK LAKE COUNCIL, Tenakee Springs * LYNN CANAL CONSERVATION, Haines * TAKU CONSERVATION SOCIETY, Juneau
NARROWS CONSERVATION COALITION, Petersburg * FRIENDS OF GLACIER BAY, Gustavus * TONGASS CONSERVATION SOCIETY, Ketchikan
ALASKA SOCIETY OF AMERICAN FORESTDWELLERS, Point Baker * JUNEAU GROUP SIERRA CLUB * YAKUTAT RESOURCE CONSERVATION COUNCIL

2.

As you heard, there is disagreement over job numbers. When including Forest Service employees, Mr. Finney estimates 3500 Tongass forest products jobs. Direct Tongass timber jobs, according to Mr. Finney, is 2700. However, the most recent reliable information, found in the USFS Timber Supply and Demand Report for 1988, shows 2031 direct Tongass timber jobs. Based on the Forest Service's estimates of the ratio of jobs to board foot sale quantity, there would have been 2200 direct Tongass timber jobs in 1989. But whatever the job numbers are, H.R. 987 would not impact the existing number of Tongass-dependent jobs.

If parts of the Tongass are to be managed as tree farms to provide jobs, then it should be done right. SEACC supports intensive management (eg. thinning of second growth stands and funding for logging of the marginal timber stands that make up the majority of the Tongass commercial forest) and value-added processing -- we could have more Tongass timber jobs with the same amount or less timber than is being harvested now.

CLARIFICATIONS

Forest Service Associate Deputy Chief George Leonard mistakenly said that "fish enhancement is not permitted in Wilderness."

ANILCA Section 1315(b) specifically provides for fish enhancement activities in Wilderness. (Fish enhancement is also allowed in LUD IIs, for that matter.)

The Forest Service stated that H.R. 987 would remove 250,000 acres scheduled for harvest over the next 100 years.

Using the Forest Service's own figures, SEACC calculates that H.R. 987 would remove only 50,000 acres of scheduled-for-harvest that is the kind of timber the pulp mills have relied upon in the past (30,000+ board feet/acre). This is hardly a major crippling of the scheduled timber supply -- also, more timber volume can be made available and scheduled via the TLMP Revision.

Can't we wait and make a decision on lands later -- or is the fight irrespective of any new information?

We can't wait -- the very best and most threatened fish and wildlife watersheds, such as Nutkwa, Kadashan, Lisianski, and Calder-Holbrook, would still be logged if left up to the Forest Service. Located in the 50-year contract areas, these watersheds have the high-volume timber historically targeted by the pulp mills and they are listed in their life-of-the-sale operating schedules.

New information isn't going to change the importance of these areas to the non-timber communities and businesses already using them as the basis for their livelihoods. The fight is over key areas -- specific river valleys and lower mountainsides. The areas in H.R. 987 and S. 346 were chosen because of their economic importance in their current old-growth state. The highest and best use of these areas is preserving them in their natural state. If anything, accurate new information is likely to maintain or intensify the controversy. For instance, the Alaska Department of Fish and Game believes that the wildlife declines predicted in the Revision's recent Management Analysis would have been 100% greater if the wildlife habitat models had been properly used by the Forest Service.

Senator Murkowski said there have been no field hearings on Wilderness.

We ask you to keep in mind that permanent lands protection (either by Wilderness or some other name) and mandatory buffers were major topics of the April 1989 Senate field hearings in Ketchikan and Sitka. We think an examination of that hearing record is clear -- Alaskans support legislated protection of key areas. (See Attachment (F))

Don Finney complained about how lands protection would block numerous road access opportunities.

His charges were grossly exaggerated. Please see Attachment G for clarifications on road access.

Reaching for straws. Don Finney claimed that the timber industry is good for tourism in Southeast Alaska.

Tourism is a booming industry throughout Alaska. According to Forest Service figures, 350,000 people visit Southeast Alaska annually, and in 1988, they generated $74 million for the regional economy. The primary reason people visit Southeast Alaska is for expected wilderness values. Whether tourists come to the area to view scenery, photograph wildlife, or to go fishing or hunting, nearly all visitors expect to experience the wildness of Southeast Alaska.

A network of clearcuts and logging roads destroys the aesthetic appeal of the Tongass and threatens fish, wildlife, and other values associated with undisturbed areas. Pending legislation that includes the permanent protection of lands and the protection of fish streams will have a positive effect on the future of tourism in Southeast Alaska.

Mr. Finney feels that the Forest Service should provide public timber to Native logging operators when private Native lands have been exhausted of their timber.

Federal laws require sustained yield logging practices on all our national forests. The rapid liquidation of private Native timber on a non-sustainable basis should not be rewarded by guaranteeing a future supply of national forest timber once Native timber runs out.

Mike Barton stated that the wildlife declines predicted by Forest Service biologists in the KPC sale area were a "worst-case scenario."

This is incorrect. The predicted drastic declines in birds and mammals on the Tongass would be a consequence of the Forest Service's preferred alternative in their EIS for KPC's 1989-1994 operating period.

Thank you very much for thoroughly examining the problems with the management of the Tongass National Forest. We look forward to getting this issue resolved.

Sincerely,

Bart Koehler

Bart Koehler
Executive Director, SEACC

Questions by Senators McClure and Wallop for K.J. Metcalf, Southeast Alaska Conservation Council

1. Mr. Metcalf, your testimony indicates on page 7 that the Forest Service planning alternatives for the Tongass Land Management Plan (TLMP) revision are "a sham," that the Forest Service has not prepared a basic forest plan, notwithstanding TLMP, and that Mr. Overbay of the Forest Service's Washington office has "scuttled" plans for a true TLMP Revision. Am I correct?

A: Yes, I did state, and firmly believe, that the alternatives for the TLMP Revision are a "sham." I say that based on the following facts:

The alternative entitled "incorporates H.R. 987" is not a representation of H.R. 987. In this alternative the Forest Service has removed hundreds of thousands of acres of commercial forest land, including areas that have already been clearcut, from the timber base in addition to the withdrawals included in H.R. 987. As a result, this alternative implies a very large reduction in timber supply -- a reduction that is probably at least 3 times greater than that implied by H.R. 987.

If the Forest Service was serious about portraying H.R. 987, they would overlay the legislation on the existing Tongass management. That would constitute a legitimate alternative.

The Effects Analysis, the very foundation for all alternatives, is misrepresented in *Understanding the Past...Designing the Future*, the Forest Service document distributed to the public. The charts and graphs in this "user friendly" publication do not correspond to the technical information in the four volume "Assessment of the Management Situation" on which *Understanding the Past...* is supposedly based. I reference specifically in the public document the Wildlife Capability Chart (p. 55), Recreation Capacity Chart (p. 56), Employment Graph (p. 58), and Comparison of Benchmark Findings Table (p. 59).

Attachment O is the February 8, 1990, testimony of Dr. Dave Anderson of the Alaska Department of Fish and Game before the House Committee on Government Operations, Environment, Energy, and Natural Resources Subcommittee. The Alaska Department of Fish and Game is seriously questioning the validity of the Revision work to date. At the hearing, Dr. Anderson stated ADF&G's belief that if wildlife habitat models had been properly used by the Forest Service, some of the predicted wildlife declines would have been as much as 100% greater than reported in the Forest Service's most recent documents.

With these errors there is no possibility of the Forest Service portraying accurate effects of their alternatives, hence the public is misled.

Additionally, the Forest Service's timber inventory, as portrayed in the timber type database, is very inaccurate. This will prohibit the analysis of the Forest Service's alternatives from describing site-specific effects. This site-specific analysis is crucial to the resolution of many issues and, again, puts the validity of these alternatives in serious question. (See Attachment P)

2a. How were SEACC's 24 areas chosen?

All of SEACC's proposed areas are based on over a decade of meetings with individuals and organizations throughout Southeast Alaska. These meetings identified areas of economic, subsistence, or recreational importance to Southeast Alaskans -- each proposed area has a constituency.

SEACC's Lands Protection Proposal is the product of over ten years of grassroots work in the communities of Southeast Alaska, and reflects SEACC's detailed study and assessment of the multiple resource values of the Tongass and of each of the 24 areas included in our proposal. The public process of developing the proposal, and the Tongass natural resource research that supports the proposal, are detailed in our responses to questions 2b and 2c, below.

Alaskan conservationists have supported protection for most of these 24 areas since the early 1970s (and even before that in some cases), when it became clear that the Forest Service intended to clearcut every acre of "commercial forest land" that was not specifically and legally off-limits to logging. The technical document for the Analysis of the Management Situation clearly shows that the Forest Service still holds this position.

SEACC's land protection proposal represents the recommendation of our 13 member organizations, which are located in 11 communities across the Alaska Panhandle: Haines, Yakutat, Gustavus, Pelican, Juneau, Sitka, Petersburg, Wrangell, Tenakee Springs, Point Baker, and Ketchikan. The SEACC proposal also represents the recommendations of our approximately 1000 additional individual members, many of whom are commercial fishermen, business people, and subsistence resource users. SEACC's board of directors is composed of 25 Alaskans from across Southeast Alaska. The present board includes former pulp mill workers, commercial fishermen, subsistence resource users, professional fisheries and wildlife biologists, hunters, former timber operators, private business people, Alaskans engaged in tourism and recreation businesses, and elected community officials.

In short, SEACC's member groups, individual members, and board of directors are real Alaskans from all communities and all walks of life. SEACC knows and uses the resources of the Tongass. The SEACC lands protection proposal, approved by the board and based on solid citizen support, is a conservation proposal and rests on sound principles of habitat management and protection, and is fully consistent with the principle of balanced multi-resource management of our national forests. Further, it leaves the existing Tongass-dependent timber industry plenty of timber to continue their operations.

2b. What kind of matrix mapping of other resources did you do in your land planning process?

SEACC used Tongass resource maps in several ways in the development of the SEACC Lands Protection Proposal for the Tongass. Maps of all Tongass resources were utilized in various ways in order to assure that the SEACC proposal is based on careful consideration of solid, substantive natural resource information.

Naturally, we studied all of the resource maps prepared by the Forest Service as part of its formal planning process. This included the resource maps associated with the Tongass Land Management Plan [TLMP], the administration of the two long-term timber sales, the Wilderness management plans prepared by the agency, and other maps prepared as part of the TLMP Management Area Analysis process. Types of maps include timber stand maps, wildlife habitat maps, salmon stream catalogues, recreation opportunity spectrum delineations, general land allocation maps, and maps of proposed logging operations. After many requests SEACC finally obtained copies of the Forest Service transportation maps which identified existing and potential roads on the Tongass. That map allowed us to consider transportation needs and the existing road system as we developed our proposal.

SEACC also studied the maps prepared by the Alaska Department of Fish and Game (ADF&G) as part of its "Forest Habitat Integrity Program (FHIP)", as well as the ADF&G anadromous stream catalogue. The stream catalogue is important because it maps nearly all of the salmon streams on the Tongass according to what species of fish are known to use each stream.

In 1983-1985 SEACC and its member organizations participated in every step of the planning process for the five year operating plans for the two 50-year timber contracts held by Alaska Pulp Corporation (APC) and Ketchikan Pulp Corporation (KPC). In both contract operating plans our goal was to design and present alternative logging proposals whereby the Forest Service could meet its contractual timber supply obligations while still protecting key fish and wildlife watersheds.

SEACC staff and volunteers spent, literally, hundreds of hours studying Forest Service maps and map overlays that showed: commercial forest land, timber stands by volume class and operating cost recovery, roads and future road corridors, timber harvest layout plans, recreation sites, catalogued salmon streams, wildlife habitat, and key wildlife use areas.

Unfortunately, the Forest Service rejected SEACC's proposal for the APC contract area, and accepted only small parts of our proposal for the KPC contract area. The Forest Service told SEACC that the long-term contracts gave the timber companies the dominant voice in final logging plans and that the contracts did not allow the agency enough flexibility to accept SEACC's proposals.

These efforts taught SEACC that the long-term timber contracts were simply too ironclad to allow for true, balanced multiple use management of the Tongass. The contracts forced a management system where timber dominated--at every turn on every acre. Our work on these timber plans had several results:

1. It provided part of the multi-resource background for SEACC's Tongass reform proposal;
2. It illustrated that permanent lands protection was necessary to keep key wildlife, fish, subsistence, and recreation areas from being logged;
3. It demonstrated the need to cancel the long-term timber contracts so that true, balanced multiple use could take place on the Tongass.

In 1983, SEACC initiated a community outreach program designed to encourage local community discussion of fish and wildlife habitat needs on the Tongass. As part of that program the public was invited to map areas of importance to local communities for hunting, trapping, fishing, subsistence, and recreation. Because this map project was so integrally tied to SEACC's public outreach process it is described in detail in the response to question 2c, below.

2c. How many public meetings did you hold around Southeast Alaska to explain your land planning proposal?

The seed of SEACC's Tongass lands proposal was sown in the 1970s, when SEACC's member organizations assembled a proposal to protect 45 key fish, wildlife, and recreation areas on the Tongass. In the 1980s SEACC held dozens of meetings throughout Southeast Alaska where SEACC's Tongass land protection and reform proposals were discussed. Many of these meetings were regular meetings of our local member organizations, which are open to the public. Some of these meetings were regular meetings of local Fish and Game Advisory Committees (the groups that make policy and regulatory recommendations to the state fish and game boards and to the Governor), and some were sponsored by local elected officials, such as the Pelican City Council, the Tenakee Springs City Council, and the Point Baker Community Association. All in all we've held more than 40 public meetings regarding our land planning proposals.

A cornerstone of SEACC's public process of developing our Tongass reform proposals was the series of formal public meetings held between 1983 and 1985. SEACC conducted a series of public "habitat conservation workshops" throughout the Panhandle, in Ketchikan, Craig, Tokeen

(Sea Otter Sound), Point Baker, Petersburg, Wrangell, Sitka, Tenakee Springs, and Pelican.

In every community the meetings were well publicized and participation by "Alaskans from all walks of life" was specifically encouraged in posters and radio announcements. Meeting participants invariably included loggers, fishermen, local business people, hunters, trappers, and recreationists. At seven of the meetings local Mayors or council members attended and participated.

The subject of the local workshops was fish and wildlife habitat. The goal was twofold. First, SEACC encouraged public discussion of the role of fish and wildlife habitat in local hunting, fishing, and subsistence. Second, SEACC provided copies of Forest Service base maps of the Tongass, and topographic maps of the immediate local area, so that local residents could identify and mark areas of particular importance for local use.

The resulting maps and map notes, all developed by Alaskans who actually use fish and wildlife resources on the Tongass, were presented to the SEACC board of directors and were used as guides in developing both the SEACC Lands Protection Proposal and the foundation of the Tongass Timber Reform Act. The hand drawn public use maps really helped focus SEACC's attention on the community level and on those who directly use fish and wildlife resources.

The maps developed at the "Habitat Conservation Workshops" led directly to the identification of many key areas in the SEACC Lands Protection Proposal: the Outside Islands, Calder-Holbrook, Lisianski River, Kadashan, Hoonah Sound, the Chuck River, Naha River-Lakes, Sarkar Lakes, South Etolin Island, Karta, and West Duncan Canal.

In 1986, based upon our community work, SEACC submitted a list of 281 VCUs for "interim Protection" to be deferred from logging until the TLMP Revision was completed. The Forest Service refused to protect many of the most important and most threatened areas via the "planning process."

We knew we had to seek Congress' help to protect key areas. Thus, we were forced to embark upon constructing a legislated lands protection/Wilderness designations package for the some of the most important areas.

Built on the earlier foundation of habitat workshops in 1983-85, SEACC took a draft map for Wilderness around to over a dozen Southeast Alaska communities, meeting with interested public and community officials. Some boundaries were expanded, some were reduced. All this occurred in 1987-88. Public meetings in Yakutat resulted in our change in position from Wilderness designation to Special Management for the Yakutat Forelands. More meetings and work sessions in 1988 and 1989 led to additions of Anan, Point Adolphus, Port Houghton, Trap Bay, and South Kuiu. In 1990, we added Salmon Bay Lake watershed -- at the request of commercial fishermen and subsistence users dependent on the area's fish and wildlife.

Also, back in 1988, SEACC was requested to participate, along with the timber industry, in over 6 months of intense negotiations in the U.S. House regarding Tongass reform. One of the most fought over discussion points was lands protection. We met with timber industry officials day in and day out. The result was proposed protection for 7-10 key watershed areas, which was never finalized because the Senate refused to accept the language.

2d. Did you consult with other multiple use resource groups, including the timber industry in making your land use allocations? What consideration did you give to the needs of timber-dependent communities?

On the Tongass National Forest, "multiple uses" include recreation-tourism, timber, wildlife,

fish, and subsistence. SEACC consulted with groups representing all of these uses, although our emphasis was on non-timber uses.

SEACC consulted with and continues to coordinate closely with:

United Fishermen of Alaska
Alaska Trollers Association
Southeast Seiners Association
United Southeast Alaska Gillnetters Association
Sealaska Corporation (a diversified corporation with interests in seafood, timber, tourism, and subsistence) and other village corporations
The Wildlife Society
Alaskans for Responsible Resource Management (concerned with small scale logging, subsistence, and habitat protection)
Tongass Tourism and Recreation Business Association

In addition, SEACC has participated in ad hoc meetings with independent timber operators in several Southeast Alaska communities. Representatives of Alaska Pulp Corporation have met with our Sitka member organization, the Sitka Conservation Society, and SEACC staff has spent many hours discussing and debating the needs of the timber industry with pulp mill representatives. SEACC staff met with KPC representatives in 1988-89, and we had many meetings with Sealaska, the third largest timber operator in the region.

SEACC has given careful consideration to ways to protect key habitat and recreation lands while still supplying adequate timber to sustain the existing Tongass-dependent timber industry. It is important for policy makers to understand that no community in Southeast Alaska depends only on the timber industry. Even in the major mill towns many people hunt, fish, and trap--and therefore depend on fish and wildlife habitat conservation as well as timber harvest. Balancing timber cutting with additional fish and wildlife habitat protection is crucial to maintaining the stability of local dependent communities. Also, many communities are not dependent on commercial timber harvesting, whatsoever -- maintenance of their community stability is directly dependent upon protecting key fish and wildlife watersheds.

In 1988 we had several meetings with the Alaska Loggers Association, including a special meeting with their Board of Directors. Most recent discussions in 1989 have not proved useful. In 1988-89 we also participated in lengthy discussions with the Tongass Committee of the Southeast Conference reviewing the merits of our land proposals and concerns of the timber industry. The Conference Tongass Committee ended up, in its original position, recommending 12 of the 24 areas on our list for permanent protection.

2e. What opportunities did SEACC afford the public to change the boundaries on its land proposals? Did SEACC provide a draft for review and receive comments?

SEACC's land proposals have a strong basis in public process and resource conservation. Clearly, SEACC's proposals represent the views of Southeast Alaska conservationists. We did not conduct a formal public review process after the proposal was submitted to Congress, but we took our "working maps" out to the public in 1987, 1988, and 1989. We added some areas because of concerns from small communities. We carried our draft map to more than a dozen communities seeking comments from interested/concerned folks. We also dropped one area (west Dall Island) after discussions with Sealaska.

The U.S. Congress has conducted a thorough public review process as it considered the urgent need for Tongass Reform. Numerous hearings in both the House and the Senate have considered the questions of fish and wildlife habitat protection needs, timber reform measures, buffer strips on salmon streams, timber harvest moratorium areas, and wilderness areas. Congressional hearings have been held in Southeast Alaska and in Washington, D.C. Members of the House of Representatives even visited the communities of Thorne Bay (founded as a Ketchikan Pulp Co. logging camp), Pelican, Steamboat Bay, Sitka, Juneau, Wrangell, and Ketchikan as part of an August 1987 tour.

2f. In fact, Mr. Metcalf, isn't it true that these areas were selected by the SEACC board with no opportunity for public input?

No. Quite the opposite. The fact is that the SEACC Lands Protection Proposal has a solid basis in community-based public outreach and involvement over an eight year period (1983-1990). I have explained the details of SEACC's extensive public process in the responses to previous questions. SEACC gave long and careful consideration to:

- local community priorities for fish and wildlife habitat protection;
- the best available Tongass resource information available from the Forest Service and the Alaska Department of Fish and Game;
- designing a lands protection proposal that would provide long-term protection for important fish, wildlife, and recreation areas while still providing a timber supply adequate to sustain employment in the existing Tongass timber industry;
- public recommendations and suggestions for lands protection.

2g. Isn't it also true that the House of Representatives simply accepted SEACC's areas without change?

The House added Inian Islands after a request from the community of Elfin Cove. The boundaries have been subject to 4 House hearings, 4 Senate hearings, and numerous discussions on these proposed areas. The House did not accept our Special Management proposal for the Yakutat Forelands.

2h. I am intrigued by the SEACC selection process, Mr. Metcalf. At page 1 of your testimony, you add Salmon Bay to your list to make it 24 areas you are after. SEACC's reason is that Salmon Bay "was selected for logging." Does SEACC select land areas for wilderness on the basis of what the Forest Service selects for logging?

A: As outlined above, lands were selected on their basis of importance for fish and wildlife resources, and importance to nontimber industries, and to local communities.

Commercial fishermen are supporting protection of Salmon Bay Lake watershed because of its importance to the commercial gillnet fishery for sockeye, coho, pink, and chum salmon. SEACC is a strong supporter of the commercial fishing industry, and we responded to their request for help in protecting this important area.

2i. What consideration did the SEACC wilderness proposal make for native village corporations wishing to buy sawmills and purchase National Forest timber? Did you contact Klukwan, Goldbelt, Shee Atika, Atikon and Koncor to determine what their timber needs would be in the 1990s? Do these village corporations agree with your proposals? Does Sealaska Regional Corporation agree to setting 24 areas aside as wilderness?

A: Again, we had several meetings with Sealaska, as well as with Haida Corporation, Yakutat

Kwaan, and Goldbelt. The timber needs of Klukwan, Goldbelt, Shee Atika, Atikon, and Koncor are their own business since they have their own lands. The Tongass National Forest should not be expected to carry the burden of Native corporations who excessively harvested their own lands at an unsustainable rate.

Klukwan, Goldbelt, Shee Atika, Atikon, and Koncor don't support the 24 proposed areas.

Sealaska supports setting aside of 7 areas in an unroaded, unlogged state (by some other name than Wilderness) -- and while doing so stated that "Sealaska supports preservation and protection of the following areas identified by the SE Alaska Conservation Council...."

2j. In fact, didn't Sealaska underwrite a poll in 1988 which showed that 85% of the people of Southeast Alaska were opposed to wilderness designation?

A: Sealaska's poll had four critical questions, none of which have the 85% figure you mistakenly refer to:

> "There should be an expansion of lands designated as wilderness in the Tongass." 48% agreed, 50% disagreed
>
> "There should be an expansion of lands in the Tongass that are off limits to road building and logging." 65% agree, 34% disagreed
>
> "Should areas designated by communities as important to subsistence, recreation, tourism, and fishing be protected and removed from the commercial timber harvest?" 76% agreed, 18% disagreed
>
> "If you knew removing these areas from the commercial timber harvest would cost jobs, do you still feel these areas should be removed?" 76% agreed, 11% disagreed

3a. Did SEACC sue the Forest Service over the 1979 TLMP, and if not, why not if it was not a "true" NFMA Forest Plan?

A: SEACC prepared an administrative appeal of TLMP in 1979, but it was filed late, allowing the Forest Service to throw it out. This removed any chance of going to court.

3b. Please explain your charges against Mr. Overbay of the Forest Service which you make at page 8 of your testimony.

A: As far as the planned revision being a true plan revision, I refer you to the attached document, *Broken Promises -- the Tongass Land Management Plan Revision.* The Forest Service's Washington office has directed the Revision not to be "zero based" -- **as was the initial intent of the revision.** Instead, the direction has been to narrow the scope to a "need to change" plan. The Tongass planning team, in consultation with their Washington, DC headquarters, has dropped a number of key elements that were necessary to include in a true plan revision.

The Forest Service's Washington Office Directives, signed by Mr. Overbay, had two negative consequences that undermine the potential of the Tongass Plan Revision to address Tongass resource problems:

1) One directive allowed the Tongass planners to postpone nearly all site-specific resource assessment to the future. This means the new plan will not deal with site-specific conflicts between deer winter habitat and logging, or with site-specific conflicts between subsistence uses and logging and logging roads.

2) The other Forest Service directive is cited by Tongass planners as the reason for abandoning the agency's earlier 1987 commitment to examine a full, complete range of alternative Tongass management alternatives. As a result, the draft Tongass plan revision the Forest Service promises to complete by June of this year will fail to provide the public or Congress with the full picture of Tongass options and will not present any useful new information.

SEACC is left wondering why the Washington Office of the Forest Service told its planners in Alaska to cut the planning process short and abandon their original goal of conducting a first-rate Tongass plan revision.

3c. You charge the Regional Forester with obviating a meaningful planning process. You worked for Mr. Barton -- is he not to be trusted? Please explain your charge. Does Mr. Barton not believe in the planning process?

A: When I left the Forest Service in 1982, John Sandor, not Mike Barton, was Regional Forester. I really can't answer whether or not Mike Barton believes in the planning process. That is a personal belief that only he can answer. I can say that the planning process has not been very good for Mike Barton or the Alaska Region. The Forest Service is saddled with an impossible task in Alaska -- the agency can not honor the language of the two 50-year contracts and the 4.5 billion board foot per decade ANILCA sell volume goal (hard target as interpreted by the Alaska Region) and meet the intent and letter of the Multiple Use Sustained Yield Act, National Environmental Policy Act, National Forest Management Act, and ANILCA.

Therefore, the agency has to make some choices. It is clear from the development and implementation of past Forest Service plans, that the Service has chosen to honor their obligations to the pulp contracts at the expense of the nontimber resources and industries, and at expense of the environmental and management legislation they are also obligated to follow. This commitment to the 50-year contracts first is clearly stated in the agency's 1989 Final Supplemental Environmental Impact Statement for Alaska Pulp Corporation's operating area:

> The Forest Service's contractual obligations were established before the enactment of ANILCA. Congress knew of the existence of these contracts when it passed ANILCA, but did not cancel them. . . . Should a conflict arise between the availability of subsistence resources and compliance with contractual obligations such as the APC contract, these contractual obligations should be considered 'necessary' under ANILCA Section 810(a)(3)(1).

This statement is proof that the two 50-year contracts drive the planning and management of the Tongass. When there is a multiple-use conflict the decision, by choice, is made in favor of the contracts. Only with comprehensive reform legislation can the Forest Service be expected to honor the laws that are supposed to guide management of public resources on our national forests.

3d. At page 22, you charge that the "problems of the Tongass were created by political decisions and the failure of the Forest Service to honor its commitments." What political decisions? Isn't SEACC in effect asking that a political decision be made to pre-empt the land planning process?

A: The Tongass has been guided by one political decision after the other including: the Tongass Timber Act of 1947, signing of the two 50-year contracts, the Alaska Native Settlement Act transferring close to 500,000 acres of the national forest into private ownership, and ANILCA.

The planning process is currently pre-empted and driven by the contracts and the 4.5 billion board foot per decade timber supply goal. Because the contracts and the supply goal pre-empt the planning process, timber must always come first in all "planning" decisions, regardless of the effects on other resources, and regardless of the wishes of the nontimber communities dependent on the Tongass.

Removal of long-term contract and 4.5 constraints is absolutely necessary before a true multiple resource planning process can be successful. Removal of contractual and timber supply constraints will take another political decision which is why we support H.R. 987. Quite simply, Congress must act to untie the contractual and political knots that bind Tongass management before any meaningful land planning process can become a reality. History shows that protection of important fish and wildlife habitat has always had to be a political decision, too, because the Forest Service has always refused to support Wilderness protection for areas that could be logged.

It is clear that the Forest Service's planning process can not work without a comprehensive political reform to allow multiple-use management on the Tongass.

3e. You worked for Mr. Barton. Please give examples of times he refused to honor Forest Service commitments on the Tongass. If you weren't referring to Mr. Barton, who in the Forest Service were you charging?

A: Again, I did not work for Mr. Barton. However, he committed to certain promises when he signed the July 1987 Tongass Land Management Plan Revision Work Plan. These promises have been broken as detailed in Attachment M entitled *Broken Promises -- the Tongass Land Management Plan Revision.*

Additionally, Mr. Barton and his staff have failed to meet commitments to the Alaska Department of Fish and Game, the state agency working with the Forest Service on the wildlife, fisheries, and subsistence aspects of the TLMP Revision. See Attachment O.

I did work for the four Regional Foresters that preceded Mr. Barton. There have been a number of broken promises over the years. See my article on page 1 of Attachment N, the Winter 1990 *Inner Voice*, a newsletter of the Association of Forest Service Employees for Environmental Ethics. My article and others in the newsletter detail some of the illegal acts and broken promises through the years. The fact that the Forest Service no longer has the trust of the public has created much of the controversy over the planning process. However, the fact that the Forest Service can NOT now deliver a plan that addresses issues on a site-specific and community level is the single biggest broken promise we face. (See pages 9-13 of our full statement.)

3f. Wouldn't a better characterization of your position be that decisions you don't like are political while those you endorse are not? Enactment of SEACC's proposals is statesmanship while maintaining current law is base politics?

A: ANILCA Section VIII, NEPA, and NFMA are Congressional laws not being honored because they conflict with ANILCA Section 705 and the 50-year contracts. Because these are laws passed by Congress, only Congress can correct the conflicts with legislation balancing multiple-use for the Tongass.

3g. When one reads your testimony, one finds it to be a web of charges against the Forest Service in general, and certain named individuals within it. You were an employee of 20 years and a TLMP planning team leader who resigned in 1982 and joined SEACC because of the Forest Service's "timber at any cost" approach. Is this an accurate portrayal of your testimony? Why do you think the Forest Service suddenly threw out the planning process in 1982? Were you not able to see it clearly until then?

A: In 1982 the Forest Service did not suddenly throw out the planning process. My article in the attached *Inner Voice* details a 30 year history of Tongass management. As a Forest Service employee, I had hopes that ANILCA's passage in 1980 and modification of the 1979 forest plan that the Tongass was finally going to turn from its "timber at any cost" management. It didn't happen. Unfortunately, just as SEACC predicted at the time, implementation of ANILCA and the forest plan were totally timber oriented. I could no longer work for this agency. I'm in Washington, DC to see that balanced management comes to the Tongass.

4a. Did SEACC agree to the 1980 compromise for Southeast Alaska set out in Alaska National Interest Lands Conservation Act (ANILCA)? Why not?

A: In an October 26, 1980 press release SEACC's board of directors stated: "After deliberation, we have unanimously voted to publicly oppose the present bill. We feel that Section 705 is disastrous to the long term management of the Tongass." SEACC feared the mandatory 4.5 timber supply goal and the guaranteed timber funds would continue Tongass mismanagement. Additionally, Wilderness designations of ANILCA did not include a number of key fish and wildlife watersheds that SEACC had proposed for protection in 1976 as part of the first TLMP.

Additionally, the language of Section 705 was never reviewed by any congressional committees, nor subject to any hearings despite four years of intense Congressional action leading up to passage of ANILCA in 1980.

4b. Did the Alaska Coalition agree to the compromise?

A: They decided not to oppose it, but they, too, were unhappy with the Tongass provisions of ANILCA. In a November 12, 1980 Ketchikan Daily News article, Charles Ciusen, chairman of the Alaska coalition said:

> We're disappointed because of the deficiencies in the bill. It is not the bill it should be, given all the circumstances. The tragedy of it is that a lot of great and special places will be damaged in the meantime. Logging will be accelerated. There will be a move to concentrate on those places now opened.

But so much for a "deal's a deal." According the same article quoted above, both Don Young and Ted Stevens said they would seek changes in the compromise the next year. "Although I voted against it (the Senate bill), I think it will be easier next year to add changes," said Stevens. "We are not overly happy with that bill," he continued. In the same article Young said he would introduce amendments in the next Congress for more concessions in the hunting, fishing and trapping areas.

4c. Did the Alaska Coalition know of SEACC's objections to the 1980 compromise?

A: Yes.

4d. Why did the Alaska Coalition override SEACC's objectives to the Southeast Alaska compromise?

A: The Alaska Coalition, with its Alaska-wide and national constituency, chose not to oppose ANILCA despite Section 705. The Section 705 language was put into the bill during closed-door sessions in the Senate with Senators Tsongas, Stevens, and Jackson, and Forest Service and other agency and administration people. No members of the public were allowed in that meeting. By the time the Senate version of ANILCA passed, there was no time for the House to make any amendments and return it to the Senate before Congress was to adjourn -- it was a take-it-or-leave-it basis. The Alaska Coalition reluctantly decided to take it and come back later, just as Senator Stevens and Congressman Young intended to do.

4e. Doesn't the forest industry have a point that the environmental community is reneging on the 1980 compromise? Isn't it true that the industry gave up quite a bit to achieve the 1980 compromise? Why should people on the Tongass have to compromise again?

A: No. Even if it was a "deal," it is would be foolish to continue with a "deal" that isn't working. The past 10 years have clearly shown that this "deal" is not balanced management on the Tongass -- the 50-year contracts and ANILCA Section 705 allow the timber industry to run rough shod over the nontimber industries and communities, regardless of the negative impacts.

No, the timber industry did not give up quite a bit. In fact, the two pulp mills got a great deal. Their contract areas were almost untouched by ANILCA's wilderness designations, and in the few cases where they were affected an equal amount of "substitute timber" was granted under Section 1315(e). On top of this they receive the benefits of the 4.5 and the guaranteed funding to underwrite roads and logging plans.

No. Only 1 1/2% of the Wilderness contains the type of timber the industry has concentrated cutting on in the past.

The timber industry continues to falsely portray this issue as one of "outsiders" versus Southeast Alaskans. The timber industry is not the only user of this forest. They don't own the Tongass -- the American people do. With only 30% of the key fish and wildlife areas currently permanently protected, many million dollar fisheries are threatened with logging, as are areas important to nontimber businesses and communities. The status quo is creating a conflict on the Tongass that must be resolved now.

4f. Will SEACC be back for more wilderness again?

No. This is the last stand for these key areas.

4g. Would SEACC agree to exchanging some of lands now in wilderness for lands now put in wilderness? In other words, is SEACC willing to prioritize areas?

A: No.

We are willing to prioritize the 24 proposed areas if necessary.

5. SEACC is presently engaged in lawsuits against the Alaska Pulp Corporation (APC) and Ketchikan Pulp Company (KPC) five-year operating plan Environmental Impact Statements. The injunctions SEACC is after would tie up more than 600 million board feet that have been *through the National Environmental Protection Act (NEPA) process. This means that the industry is not able to obtain timber from areas ostensibly left open to timber harvest. Is SEACC willing to accept limits on its ability to bring lawsuits which tie up timber sales in exchange for additional wilderness areas? For example, would SEACC agree to language similar to that in Section 318 of last year's Appropriations bill (Spotted Owl language)?*

A: SEACC has no lawsuits against KPC. We have filed an administrative appeal of the 1989-94 KPC Operating Plan EIS, but we have not asked for a stay.

However, the Salmon Bay Protective Association, a group of commercial fishermen is currently litigating against the Forest Service over buffer strips and the Salmon Bay Lake watershed in the KPC 50-year contract area. So far the temporary restraining order that is in place effects only 36 million board feet (2 VCUS and buffers) out of KPC's approved volume of 850 million board feet.

SEACC is engaged in a lawsuit against APC's 1981-86/86-90 Final Supplemental EIS. We are joined in this lawsuit by the three subsistence villages of Angoon, Kake, and Tenakee Springs. The figure of 600 million board feet is grossly inflated -- no injunction has been granted, although we have requested an injunction on only two areas that they could have entered -- Game Creek and S. Passage Point. If an injunction is granted, it will affect 130 million board feet. This would still leave over 250 million board feet -- about a 3-year's supply. The highest amount APC has harvested in recent years is 86.1 million board feet in a year. SEACC has carefully crafted its environmental litigation to protect the environment with a minimal disruption of the timber industry. Our reasonable approach is directly responsible for the fact that five years of active litigation on APC's contract area (three lawsuits) has not resulted in the loss of one single timber camp, the displacement of workers, the shutdown of either a sawmill or pulp mill, or the loss of any timber jobs. This is totally different than the "spotted owl" situation.

Neither SEACC nor the logging companies should give up rights to access the federal courts to enforce existing environmental or other laws. The Tongass Timber Reform Act (H.R. 987) will greatly reduce the litigation over Tongass forest management. Since 1971, of the nine major Tongass timber lawsuits, by environmentalists, eight were filed over administration of the 50-year contracts. Eliminating these anomalous contracts will eliminate the source of the litigation. (Timber company lawsuits on the Tongass have also been caused almost exclusively by the 50-year contracts -- i.e. recent KPC and APC damage suits, Reid Brothers litigation.)

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Alaskans support legislated lands protection in the Tongass National Forest

Alaskans strongly support protection of key fish and wildlife habitat areas by law -- not by temporary deferrals. Alaskans have established an impressive record of support for legislated protection over the past 4 years, including Senate field hearings held in April 1989 in Sitka and Ketchikan.

Southeast Alaskans supporting legislated protection of key areas include:

- The 15 communities of Hydaburg, Craig, Juneau, Elfin Cove, Klawock, Pelican, Petersburg, Point Baker, Sitka, Tenakee Springs, Yakutat, Port Alexander, Gustavus, Kupreanof, and Edna Bay;
- Governor of Alaska (official position of the State of Alaska);
- Tongass Tourism and Recreation Business Associate (representing over 100 tourism and outdoor businesses operating in the Tongass), Alaskans for Responsible Resource Management, and the Southeast Regional Council of Fish and Game Advisory Committees (from every community in Southeast Alaska);
- United Paperworkers International Union Local 962 of Sitka;
- Native organizations -- Central Council of Tlingit-Haida Indian Tribes, Sealaska Regional Native Corporation, Cape Fox Native Corporation, Hoonah Indian Association, and Alaska Native Brotherhood;
- All the region's commercial fishermen's organizations -- Alaska Trollers Association, Petersburg Vessel Owners, United Southeast Gillnetters Association, Southeast Seine Boat Owners and Operators, Southern Southeast Regional Aquaculture Association, and Northern Southeast Regional Aquaculture Association; plus the statewide United Fishermen of Alaska;
- Conservation groups -- Sitka Conservation Society, Pelican Forestry Council, Lynn Canal Conservation, Friends of Berners Bay, Alaskan Society of American Forest Dwellers, Juneau Sierra Club, Narrows Conservation Coalition, Friends of Glacier Bay, Tongass Conservation Society, False Island-Kook Lake Council, Wrangell Resource Council, Taku Conservation Society, Alaska Women in Trees, Juneau Audubon Society, Yakutat Resource Conservation Council, and SEACC.

Only 30% of the high value fish and wildlife habitat in the Tongass was granted permanent protection by the 1980 Alaska Lands Act. Many million dollar salmon streams vital to the commercial fishing industry, prime tourism destinations, and important sport and subsistence hunting areas are currently on the chopping block.

The House-passed bill, H.R. 987, gives lasting protection to the key fish and wildlife habitat areas of great concern to Southeast Alaskans while still keeping an adequate supply of timber available for harvest. The Wilderness provision of H.R. 987 only reduces the amount of potential scheduled timber supply by 11% -- from the present 450 million board feet per year to 400 million. Since the average sawlog volume harvested from 1980-1989 was 295 million board feet per year, this leaves over 100 million board feet per year of timber supply above this average still available for harvest, even permitting an increase in existing Tongass-dependent timber jobs.

(Southeast Alaska Conservation Council (SEACC), phone 202-547-0141)

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Goldbelt
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March 2, 1990

The Honorable J. Bennett Johnston
Chairman
Committee on Energy and Natural Resources
364 Dirksen Senate Office Building
Washington, DC 20510

Dear Mr. Chairman:

At the February 26, 1990 hearing of the Public Lands, National Parks and Forests Subcommittee on the Tongass legislation, you directed a question to each of the witnesses which I believe was as follows: "What is the consequence of job losses in Southeast Alaska if the wilderness areas proposed in the House bill (H.R. 987) were enacted?"

Our reply to your question will be in the context of our Hobart Bay logging operation as it would be effected by the provisions of the House bill which would designate the Chuck River and Port Houghton-Sanborn Canal wilderness areas. These two proposed wilderness areas would eliminate four proposed U.S. Forest Service sale areas near our Hobart Bay property, the logging of which would otherwise be supported by our town and infrastructure at Hobart Bay.

We estimate that approximately 180 direct full-time jobs plus approximately 30 part-time jobs will arise if logging is allowed on the U.S. Forest Service sale areas around Hobart Bay. In addition, we would like to point out that timber operations around Hobart Bay would contribute an unknown number of indirect jobs and millions of dollars of spending each year to the economies of Petersburg and Juneau and their service and supply sector businesses.

I hope this reply is responsive to your question.

Sincerely,

Joseph G. Wilson/pc

Joseph G. Wilson
President and Chief
Executive Officer

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March 2, 1990

The Honorable James A. McClure
The Honorable Malcolm Wallop
Committee on Energy and Natural Resources
364 Dirksen Senate Office Building
Washington, DC 20510

Dear Senators McClure and Wallop:

During the February 26, 1990 hearing of the Public Lands, National Parks and Forests Subcommittee on the Tongass legislation you directed two questions at Goldbelt, Inc. The following is our reply to these two questions.

Question #1: I understand you are doing extensive logging on your native lands. What procedures are you using to protect the fish habitat, and how is that working?

Goldbelt's Answer to Question #1: Goldbelt's lands at Hobart Bay, where it has logged since the early 1980's, include two streams which have significant pink salmon escapements. These significant salmon streams are Laura's Creek and the Salt Chuck Creek. Goldbelt has been highly sensitive to fisheries protection in its logging activity within the drainage of these salmon streams. Various protective measures have been utilized by Goldbelt and its contract loggers to prevent slides and siltation and to retain stream side buffer areas to protect the stream and supply large woody debris which is necessary for the salmon habitat. In addition to buffer zones of greater width than State fish and game requirements, other protective measures include: locating roads away from streams, minimizing of stream bridging, installing filter cloth on bridge decks to prevent dirt from entering the streams from trucks and equipment passing over the bridges, using hard, clean crushed rock for roadway surfacing, constructing energy dissipators at outfalls at critical culverts, logging on frozen ground and deep snow during winter, full suspension of logs over areas critical to water quality, excavating road material by costly end haul along steeper slopes, directional felling of timber away from buffer zones and not yarding logs across streams, and construction of silt catch basins along roadway ditches.

These protective measures have been highly effective. According to comparative analyses of Alaska Department of Fish and Game data concerning pink salmon escapements on Laura's Creek, the Salt Chuck Creek, and other salmon streams in the region, there has been no adverse effect to the fish habitat on these two salmon streams on Goldbelt's lands. In fact, salmon escapements have tended to increase over the period of Goldbelt's logging near Laura's Creek and Salt Chuck Creek.

Goldbelt has also been logging for two years in the drainage of the Chuck River, another significant salmon stream in the area. While its activities here are too short-term to measure their impact on salmon escapements, it is inconceivable there could be any negative impact. Goldbelt and its contract logger have avoided construction of any roads closer than 1/3 mile to the Chuck River and are leaving buffer zones of greater width than required by the state authorities. In addition, rather than bridging the Chuck River, we are using an expensive aerial cable system of over 1/2 mile in length to lift and carry logs across the Chuck River to minimize soils disruption in the drainage. These fishery protection measures in excess of requirements have been recognized and praised by the Commissioner of the Alaska Department of Fish and Game.

Question #2: Assuming the legislation were enacted, and you were permitted to select other lands, could you give the Committee some idea of what lands you might consider so that we will have an idea of what will be in the next bill?

Goldbelt's Answer to Question #2: Goldbelt has no additional selection rights under the Alaska Native Claims Settlement Act of 1971 ("ANCSA"). In the event that the Chuck River is designated a Wilderness Area, or for that matter a LUD II Area in which logging is prohibited, Goldbelt will lose its $17 million investment in Hobart Bay and over 100 miles of roads, a town and port directed at, among other things, serving as a servicing area for logging activities on U.S. Forest Service lands at Chuck River. This was one of the benefits Goldbelt assumed it was getting when it agreed to move off Admiralty Island and selected lands at Hobart Bay. If Chuck River is not to be logged, Goldbelt would be forced to request selection of other lands within the Tongass in order to salvage a portion of the original ANCSA settlement promised its shareholders.

Sincerely,

Joseph G. Wilson /BR

Joseph G. Wilson
President and Chief
Executive Officer

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March. 2. 1989

Senator James McClure
Senator Malcolm Wallop
Committee on Energy and Natural Resources
SD-364 Dirksen Senate Office Building
Washington, D.C. 20510

Dear Senators McClure and Wallop,

After the hearing on Tongass Timber Reform on February 26th, I received a set of questions from both of you via Beth Norcross. I have provided brief answers to your clarification questions.

I am sending my answers by fax as I had to return to Alaska soon after the hearing. My answers are given on behalf of United Fishermen of Alaska as well as Southeast Alaska Seiners Association. My answers are given in the order of questions received. I hope this format via fax is suitable to your needs.

Thank you for the opportunity to follow up my testimony with your questions. Please call our Washington D.C. representative, Deming Cowles, (333-1617) if any further questions arise. I hope my testimony and these answers aid in your efforts to reach successful resolution on Tongass Timber Reform.

Sincerely,

Kate Troll

Kathryn Troll
Executive Director

1. Due to a hectic travel schedule, I was unable to proof my final written testimony. As such, a typo occurred on the jobs figure. The reference to 12,000 jobs in 1986 directly from the harvesting sector should have been 2,000. The following quotes from the McDowell Report (Alaska Seafood Industry Study) answer directly the concern you raise over number of jobs, seasonality, and non-resident component.

Pg. 28: "The seafood industry, with average annual employment of 3,993 (harvesting and processing), is southeast Alaska's largest private industry, employing a third more that the region's forest products industry."

Pg. 29: "In terms of employment Southeast with 21% of the total is the state largest seafood region, just ahead of Southcentral."

Pg. 34: "Previous employment estimates credited seafood harvesting employment only in the months that a fishery occurred, neglecting pre-season time spent spent by skipper and crew gearing up and post-season time spent on repairs, clean-up gear work and other essential activities. The result, for example, would credit the skipper/owner of a 45-foot, $100,000 power troller with working only during the two to three month season when in fact he typically devotes 6 months or more a year to essential work directly related to commercial fishing."

Pg. 33: "Indeed, much of the seafood resource harvested from the state and federal waters off Alaska is harvested by Alaska nonresidents. However, excluding the groundfish fleet, residents do account for about 70% of the participation in Alaska's commercial fishing industry (79% of active permit holders are Alaska residents as are 66% of crew members). A thirty percent nonresident share may seem high but it is estimated to be approximately average for Alaska basic industries."

2. The land planning process has been ongoing on two levels. Tongass Timber Reform legislation has had a wealth of public testimony concerning the resource values of the Tongass National Forest. The areas being discussed as well as the buffer strip provision have a history of research and knowledge behind them...the areas with high resource values have not changed over the years. More importantly any final decisions made in the revision of TLMP can not go beyond it's current legal contraints, or sideboards...450 billion board foot mandate and the 50 year contracts. As we testified, these provisions hamper multiple use management in the Tongass and they are unique to the Tongass. As such, TLMP decisions will be skewed by these legal sideboards. TLMP's general alternatives incorporates SE Conference Proposal One, and H.R. 987. It also reviews the current plan. As such, waiting for TLMP means deferring the same political decisions that must ultimately be made. Given the unique Congressional sideboards, given the wealth of information gained in the numerous hearings on Tongass Timber Reform legislation, UFA believes that Congressional resolution now is indeed appropriate. In 1989 a survey of Southeast Alaskans Attitudes Toward Timber Reform Act, asked this question: Do you agree or disagree? It is time for a compromise to be reached regarding the future of the Tongass Forest that balances employment opportunties and environmental protection. 84% of the respondents answered "Yes, we agree". As such, public opinion also makes Congressional action appropriate now. The answer to question #5 gives another reason why UFA does not want Congress to wait for TLMP.

3. Our research indicates that buffer strips will not result in a loss of jobs. For example, making an adjustment of 215 acres out of a total harvest of over 800,000 acres on the long term timber sale for Ketchikan Pulp Company can be easily accomodated within the existing timber base for the long term timber sale. However, to answer your question directly, the answer is no, we would not agree to open existing wilderness areas as these areas are established by law for a multiplicity of

resource values. However in the context of question #3, we would consider making adjustments to key fisheries areas now being discussed for protection. Any consideration given by UFA would be limited to only those areas with overriding fisheries values. Furthermore, any review adjustments would be made on the basis of keeping watersheds/drainages intact.

4. This quote is a direct, word-for-word quote from the Forest Service EIS for the long term timber sale (pg. 4-163). Yes, much of the harvesting within AHMU's has occurred in the 60's and 70's. However harvesting within the AHMU's still goes on as I discussed in my testimony. No, it is not true that the standards in the EIS for the 1989-94 long term timber sale contain 100 foot buffers on all anadromous streams. A member organization of UFA is currently appealing the EIS for this long term timber sale on this very point.

5. No, I am not aware of an Oct. 6 letter to National Marine Fisheries Service (NMFS). I am however aware of a Sept. 28 letter to NMFS discussing the NMFS policy in relation to current Forest Service's practices. I do know that the riparian managment prescriptions being evaluated by the TLMP interdisplinary planning team does not include a NMFS prescription option for TLMP revision. Neither riparian management prescription 13 or 14 in the standards and guidelines analysis document for TLMP revision contains a requirement for 100 foot buffers on all anadromous streams and important tributaries.

Questions by Senators McClure and Wallop for Kate Troll, United Fishermen of Alaska

1. You say, on page 1 of your testimony that the fishing community of Southeast Alaska accounts for 12,000 jobs in the harvesting sector alone. At page 7 of the February 1990 "Role of the Tongass National Forest Timber Harvest in the Southeast Alaska Economy," the McDowell Group says there are 2,730 involved in seafood harvestry.
    a. How do you account for this disparity of nearly 10,000 jobs?
    b. The McDowell Report points out that the seafood industry is "largely seasonal" and with a "high non-resident" component. Do you agree or disagree and why?
2. The United Fishermen's Association (UFA) is unwilling to wait for the Tongass Land Management Plan (TLMP), according to page 3 of your testimony. Why does the fishing industry desire to pre-empt the land planning process?
3. If the UFA could be shown that the buffer strip policy would result in a major loss of jobs to the timber industry, would the UFA agree to open up some of the 1.6 million acres of commercial forest land within existing wilderness areas to make up the timber lost to buffer strips?
4. On page 2 of your testimony, you state, "as of 1988, one-third of the existing Aquatic Habitat Management Units (AHMUs) have been harvested." The concept of AHMUs was developed in the mid-1980s. Is it not true that the vast majority of harvesting in AHMUs took place in the 1960s and 1970s, and that the standards in the 1989-94 long-term contract contains 100-foot buffers on all anadromous fish streams?
5. On page 3 of your testimony, you say that it is insulting to the fishing industry and the communities dependent on fishing to exclude the National Marine Fisheries Service policy in the Tongass Land Management Plan planning process. Are you aware of the October 6, 1989 letter to the National Marine Fisheries Service detailing a management prescription for their policy?

APPENDIX II

ADDITIONAL MATERIAL SUBMITTED FOR THE RECORD

Statement of the U.S. Chamber of Commerce

ON: THE TONGASS TIMBER REFORM ACT, H.R. 987

TO: SUBCOMMITTEE ON PUBLIC LANDS, NATIONAL PARKS AND FORESTS OF THE SENATE COMMITTEE ON ENERGY AND NATURAL RESOURCES

BY: SUSAN C. MOYA

DATE: FEBRUARY 7, 1990

The Chamber's mission is to advance human progress through an economic,
political and social system based on individual freedom,
incentive, initiative, opportunity and responsibility.

The U.S. Chamber of Commerce is the world's largest federation of business companies and associations and is the principal spokesman for the American business community. It represents nearly 180,000 businesses and organizations, such as local/state chambers of commerce and trade/professional associations.

More than 93 percent of the Chamber's members are small business firms with fewer than 100 employees, 45 percent with fewer than 10 employees. Yet, virtually all of the nation's largest companies are also active members. We are particularly cognizant of the problems of smaller businesses, as well as issues facing the business community at large.

Besides representing a cross section of the American business community in terms of number of employees, the Chamber represents a wide management spectrum by type of business and location. Each major classification of American business—manufacturing, retailing, services, construction, wholesaling, and finance—numbers more than 10,000 members. Yet no one group constitutes as much as 32 percent of the total membership. Further, the Chamber has substantial membership in all 50 states.

The Chamber's international reach is substantial as well. It believes that global interdependence provides an opportunity, not a threat. In addition to the 59 American Chambers of Commerce Abroad, an increasing number of members are engaged in the export and import of both goods and services and have ongoing investment activities. The Chamber favors strengthened international competitiveness and opposes artificial U.S. and foreign barriers to international business.

Positions on national issues are developed by a cross section of its members serving on committees, subcommittees and task forces. Currently, some 1,800 business people participate in this process.

STATEMENT
on
THE TONGASS TIMBER REFORM ACT, H.R. 987
for submission to the
SUBCOMMITTEE ON PUBLIC LANDS, NATIONAL PARKS AND FORESTS
of the
SENATE COMMITTEE ON ENERGY AND NATURAL RESOURCES
by
Susan C. Moya*
February 7, 1990

The U.S. Chamber of Commerce, the world's largest federation of business firms, state and local chambers of commerce, and trade and professional associations, appreciates this opportunity to express its views on the Tongass Timber Reform Act, H.R. 987, approved by the House of Representatives last year.

The Chamber opposes H.R. 987 and other so-called Tongass timber reform measures because it believes that it is inappropriate and impossible for Congress to micromanage national forests, as provided for in H.R. 987. Rather, the Chamber urges Congress to allow the forest management planning process, prescribed by Congress in the National Forest Management Act (NFMA) of 1976, to balance the many competing uses of national forests. Congress should not intervene beyond its oversight responsibilities.

The detailed micromanagement prescriptions in H.R. 987, such as wilderness designation and requirements that a buffer zone be left on either side of fish-spawning streams and their tributaries, are issues more appropriately treated as part of the revised Tongass Land Management

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* Susan C. Moya is Manager, Energy and Natural Resources Policy.

Plan (TLMP). A Draft Environmental Impact Statement (DEIS) on the TLMP will be issued for public comment this spring. The DEIS will contain data gathered by the U.S. Department of Agriculture Forest Service over the past 10 years. The Chamber believes that consideration of this information is necessary before any informed public policy decisions regarding this important national forest can be made.

The Tongass National Forest in Alaska is a unique forest of islands supporting an array of fish and wildlife species, including the largest concentrations of bald eagle and brown bear populations on the continent. However, the Tongass also supports an array of activities and has many uses, including timber harvesting, commercial and sport fishing and hunting, recreation, tourism, and native subsistence. All of these functions can -- and are -- existing in harmony.

A balance must be struck among community stability, logging, wilderness designation, and the effects of activities on wildlife and fisheries. The TLMP revision process provides a fair and balanced approach to managing the Tongass National Forest and is best able to reflect changes that have taken place in southeast Alaska -- in public values, in market conditions, and in knowledge about forest management activities and resource interrelations.

The Tongass National Forest is currently managed according to guidelines defined in the 1979 TLMP. That plan, the first for this forest, was the product of extensive public involvement, an NFMA requirement. Many of the issues at the heart of today's debate were deliberated during the preparations of the 1979 TLMP -- how much wilderness is necessary, how much timber should be made available to local industry, what kind of recreation should be emphasized, and which areas should be open to development.

The 1979 TLMP took three years of analysis and preparation by resources specialists before approval. Even then it did not please everyone. But it was endorsed by most people because the process had provided the opportunity for extensive public participation, something the Congressional hearing process cannot match. The TLMP also provides the Forest Service the flexibility to be responsive to the needs of varied interests and changing conditions -- a provision that is not in H.R. 987 or other Tongass micromanagement bills.

Today, 33 percent of the Tongass National Forest is managed as wilderness. Sixteen percent is allocated to roadless area management to retain the wildland character of the area; 17 percent is managed for a combination of uses, including recreation and some timber harvesting; 25 percent is allocated to intensive resources use and development opportunities, primarily timber harvesting and mining. Only 10 percent of the Tongass is allocated for timber harvesting under the current plan. A total of 52 percent, more than half of the 16.7 million acres of forest, is currently "set-aside."

To ensure that the TLMP and other forest plans continue to be responsive to citizens' concerns, the NFMA requires forest plans to be revised on a "10-year cycle or at least every 15 years." In compliance with these regulations, the TLMP is being revised. The Forest Service is analyzing a broad range of suggested changes to the TLMP identified in an extensive public process, including the environmental, economic, and social consequences of each suggested change. Other factors being examined are the flow of resulting goods and services, the associated costs and benefits, resource management standards and guidelines, mitigation measures, and monitoring requirements.

A draft EIS is scheduled for completion in June of this year and will again be subject to public review. After comments are received and incorporated, a final environmental impact statement and final revised TLMP will be developed for the Regional Forester's approval. Once approved by the Regional Forester, that decision may be appealed to the Chief of the Forest Service.

When signing the NFMA on October 22, 1976, former President Ford praised it as providing "balanced consideration of all resources in the land management process." The late Senator Humphrey similarly praised the act as being a "milestone in Federal policy towards management of our vast National Forest System...."

Conclusion

The Chamber believes that Congress acted wisely in crafting a measure that provides broad policy direction within which the Forest Service can operate with flexibility to meet specific forest management needs. Senator Humphrey argued in 1979, and the Chamber contends now, a national forest cannot effectively be managed from Capitol Hill.

The Chamber urges the subcommittee to reject H.R. 987 and other Tongass "reform" legislation until the revised TLMP is complete and has been reviewed. Then, should legislation be necessary, the plan will provide the data needed to make informed policy decisions.

SALMON BAY PROTECTIVE ASSOCIATION
BOX 422 PETERSBURG, ALASKA

TESTIMONY OF
ALAN M. STEIN
President
Salmon Bay Protective Association
BEFORE THE US SENATE ENERGY COMMITTEE
FEBRUARY 26, 1989

Mr. Chairman and members of the Energy Committee thank you for this opportunity to adress you.

I represent the Salmon Bay Protective Association, a non profit Alaska corporation whose membership includes 180 commercial fishermen and women as well as subsistence users; further, SBPA has the substantial financial backing of eight salmon canneries and cold storages in Southeast Alaska.

SALMON BAY'S LAWSUIT AGAINST THE FOREST SERVICE

Last August, we sued the US Forest Service when they approved a five year clearcutting and roading plan for the Ketchikan Pulp Co on Prince of Wales Island. The court granted us swift temporary relief.

In September, the federal district court for Alaska issued a temporary restraining order in the SBPA's favor which halted the Forest Service's practice of clearcutting giant trees within 100 feet of both sides of **all** Class I and II streams on Prince of Wales Island. About half the commercial logging on the Tongass National Forest takes place on this island .

The court found that we had raised serious questions about whether the Forest Service complied with the Clean Water Act, the National Enviornmental Policy Act, and the Alaska National Interest Lands and Conservation Act.

The court earlier ordered the Forest Service provide five days notice before cutting or roading the million dollar a year fishery watershed of Salmon Bay Lakes. By agreements, these orders were extended to February 28, 1990.

Hopefully, the court will extend protection for Salmon Bay and the buffer strips beyond Feb 28th while it considers a preliminary injunction motion which is ripe for decision. Such an extention would provide the Senate with the opportunity to consider appropriate protection for Salmon Bay and the buffer strips.

SALMON BAY'S POSITION ON TONGASS LEGISLATION

We hope the legislation for the Tongass National Forest which this committee formulates will contain two key provisions.

First, we request you add Salmon Bay Lakes, VCU 534, to the 23 areas in the House Bill and we support the establishment of permanently protected status for these 24 areas of the Tongass. The Southeast Regional Fish and Game Advisory Board, the United Fishermen of Alaska, the United Southeast Alaska Gillnetters Association, and the Southeast Alaska Conservation Council support this addition of Salmon Bay and I include two resolutions for the record.

Second, the SBPA requests this committee include language which requires a mandatory minimum no-cut 100 foot buffer strip of trees, measured horizontally, along all Class I, II, and important III streams. We prefer the buffer language which the House passed Tongass Timber Reform Act contains. For twenty five years Alaskan fishermen have requested statutory fixed width buffer strips. This is a protective practice whose time has come of age.

The eight seafood processors who have contributed to our organization have authorized me to inform you that they support the creation of 100 foot minimum buffers on Class I, II, and important III streams, and complete protection for the million dollar fishery watersheds. I know that many of them have written to some of you concerning this position.

SIZE OF BUFFER REQUEST

Senator Murkowski has recently supported statutory 100 foot buffers for Class I streams. But class I stream buffer strips for the KPC sale area of 800,000 acres constitutes but two and a half percent of the buffer strip acreage, only 45 acres out of 1745 buffer strip acres that will be logged on Class I, II, and III streams in the current five year plan.

Statutory protection for 1745 out of 28,500 acres that will be cut in the next five years would flesh out of the multiple use concept. Already, the Forest Service has allowed cutting of 30% of Class I stream buffer strips. If the level of salmon production is to be upheld, buffer strips must be left along our streams. It is imporant the committee understands that their decision will affect thousands of miles of streams and that all of these stream affect salmon habitat.

MUDDY LOGGING CHUTES DUMP INTO SALMON HABITAT

I'd like to give you a personal portrait of what happens during a commercial logging operation on the Tongass.

In the spring of 1972, a year after becoming an Alaskan resident, I logged off the west coast of the Prince of Wales. I straped 1.5 inch diameter cables around logs some of which were as big as six feet in diameter. The cables attached to steel haul lines, thicker than a flute, which wound around pulleys in spar trees as far a quarter mile from the salt water. A huge diesel engine powered winch pulled these giant trees down hill. Nothing could stand against these monstrous chunks of wood as they came crashing down the mountain slopes. Stumps shattered. Thick mats of moss became brown muddy furrows. After several days and several inches of rainfall, the log chute became a deep mud bath. A fellow worker sunk in over his thigh. For the month that we utilized this site, the almost daily rain which occurs in this rain forest washed plumes of mud into Shakan Straight's crystal clear salt water. When yarding occurs above fresh water streams, as almost all yarding does, similar mud chutes result.

This initial impact of the yarding operation results in muddy water running into streams during the spring when the salmon fingerlings are about to depart the streams for the sea, or in the fall when salmon eggs buried in the pebbles must have clear water to provide them with oxygen. Muddy water impacts salmon at both stages of the life cycle.

A second and chronic source of mud is from the 1200 miles of federally subsidized dirt roads the Forest Service built on Prince of Wales Island. Streams of mud regularly flow from them .

POST LOGGING IMPACTS

Muddying of the waters continues after the loggers depart. Logging next to class II and III streams inevitably furrows the soil, jars stumps, and destroys anchoring roots. Stream banks frequently overhang. The yarding operation breaks the banks and knocks them into the stream where swift water carries the mud down stream into the class I salmon habitat. The tree root system, which ties the soil together on the steep mountain slopes, has not regained its anchoring properties. Without the support of tree roots, heavy rains become a lubricant that allow whole paths of soil to slide as a mass down hill. Some slides would fill thousands of dump trucks. Slides as large as a hundred dump trucks are common. These mud slides inevitably work their way into the streams bit by bit over a long period of time. Forest Service research has concluded that the rate of slides from logging operations increases by a five fold factor over the rate in uncut areas. Buffers are a last line of defense against the slides and a first line of defense against broken banks and log plowing during logging operations. Buffers on class II and III streams will guard against gross and obvious impacts to water quality from logging.

A second effect which is not as easily detectable, but is equally detrimental, is the change in both winter and summer stream temperature extremes. Buffers act as insulation. Layers of tree boughs rise up to two hundred feet on many 500 year old trees. These layers help prevent stream temperture from rising above a maximum of 60 degrees, a point at which salmon begin developing stress. The trees also prevent streams from freezing in winter, thus killing the salmon eggs incubating in the pebbles.

Finally, as the National Marine Fisheries Service research has established, buffers are the store house for big trunks, branches, and root systems. Buffers are to salmon streams what bones are to people, the structure which supports them . These large pieces of wood hold banks in place and prevent mud from running into the stream, they provide pools for fish, they absorb the surge of heavy rains, they prevent the stream from becoming a race way. Without a buffer strip at least 100 feet wide, there is no way to furnish the stream with a continuous supply of big trunks and branches. I heard a Forest Service hydrologist state at a conference that it was not practicable or desirable to try to anchor trunks to streams. Floods inevitably pull the anchors out. With no practical alternative to leaving the trees alone, buffers should be legislatively mandated.

Water Monitoring and Research

For the 19 years that I have been an Alaskan resident and commercial fisherman, the Forest Service has not conducted scientific monitoring for water temperature, turbidity, sedimentation, and disolved oxygen at a number of sites, on the same stream, for a period of years. Given the millions of dollars that tax payers have paid to have the agency come up with answers to the impact of logging on these water quality parameters, the lack of data for these parameters on a single stream system is appalling.

In contrast, the research NMFS conducted to establish the critical importance of large woody debris, and the irreparable impacts of clearcutting to stream banks, is overwhelmingly accepted. Even Alaska Forest Service biologists approved the NMFS findings when they sat on the prepublication committee for the article the NMFS biologists wrote.

Delaying the implementation of the NMFS buffer policy on the grounds of inadequate research is therefore disingenuous. Sound scientific research supports buffers and I know of no scientific research that supports a conclusion that buffers are not needed.

The timber industry argues a record salmon runs in 1989 prove no damage to streams from logging. I take issue with that argument.

First, the long term and irreparable impacts of logging occur 30-75 years after clearcutting when the old trunks decay and wash out and no new dead fall replaces them. Large scale and wide spread logging has only gone on since the early 60s. We will thus start to feel the impacts of logging from the 60s effecting us sometime after the end of this decade. I know of individual streams which were logged that have had decreased runs.

Second, fisheries managers kept us from fishing our normal four days all during the 70s and into the 80s. The State of Alaska fishery managers increased the number of fish they wanted in the streams for spawning every year. On Prince of Wales Is. they managed to boost escapement from about two up to seven million pink salmon spawners by restricting the fishing effort.

Thus, our sacrifice insured more salmon escaped our nets to spawn and increased the number of salmon returning during the next cycle. Our sacrifice masked effects of logging.

Third, we have had unusually warm winters for almost ten years thus increasing survival.

These factors explain large runs. But with 80% of streamside timber on the chopping block under current Forest Service plans, record runs will likely turn to miniscule runs. Thus, the 27 million dollar pink salmon catch (one of five species) attributed to Prince of Wales Island streams in 1989 could drop precipitiously in ten years. This drop would effect the entire SE Alaska fishing industry.

Our request for protection is a request for multiple use. It is a recognition that the fishing industry's survival depends on the complete protection of valuable watersheds and a narrow 100 foot buffer strip of uncut big old growth trees along our streams. This buffer request will take up only about 6% of the acreage in the 1989-94 plan for Ketchikan Pulp Co. I urge you to give us the protection our industry needs to survive well into the next century. I urge you to create statutory 100 no cut buffers on Class I, II, and III streams and to protect the 24 valuable watersheds.

In 1976, I made a request for buffers to the Senate when my son was two years old. He is now almost 17 and capable of setting my net at sea on his own. A new generation inherts our skills and knowledge. For fishermen, without streamside trees to protect salmon habitat, the knowledge of the tides and winds we pass on to our children will be meaningless unless the bounty of salmon continue their return. Congress can maintain our salmon runs which are this link between generations and the ages by mandating the NMFS buffer policy.

Attachments for the Record:

1. **Southeast Alaska Fish and Game Advisory Board letter to Senator Bennett Johnston of February 15, 1990 concerning protectioin for Salmon Bay and Class I, II, and III buffers.**
2. **Resolution 90-02 Southeast Alaska Gillnetters Association concerning the same request**
3. **Affidavit of David Sturdevant concerning lack of Forest Service monitoring.**

AFFIDAVIT OF DAVID STURDEVANT

1. I am employed by the Alaska Department of Environmental Conservation (ADEC), in the Division of Environmental Quality, Water Quality Management Section, as the nonpoint source pollution control coordinator. In my position, I am responsible for ADEC's project to evaluate and control nonpoint source pollution throughout Alaska, including nonpoint source pollution associated with timber harvest. I have been employed by ADEC since 1976, and have been in my present position since October 28, 1987. I hold a bachelor's degree in biology and a master's degree in ecology. I am familiar with the general impacts of logging and roading on water quality in Alaska.

2. In May of 1980, the U.S. Forest Service and ADEC signed a Memorandum of Understanding (MOU). In that MOU, the Forest Service explicitly acknowledged its obligations for protection of water quality on National Forest lands. The Forest Service agreed to inform ADEC of known and suspected violations of state water quality standards on National Forest lands; to monitor the implementation of its management practices and their effectiveness in meeting state water quality standards; and to meet annually with ADEC to evaluate the program and review water quality information.

3. During my tenure in this position, the Forest Service has not reported any water quality violations to ADEC, as far as

EXHIBIT 25

I am aware. ADEC has no records of earlier reporting of water quality violations, and no records of communication by the Forest Service regarding monitoring of the implementation or effectiveness of management practices. The Forest Service has recently compiled a manual of "best management practices," called the "Soil and Water Conservation Handbook." This handbook could provide the basis for, but does not constitute, a program to monitor effectiveness of management practices. During my tenure in this position, there has been no meeting between ADEC and the Forest Service in regard to the MOU. Records indicate that the first meeting pursuant to the MOU was held on October 28, 1983. An internal ADEC memo of November 1983 stated that the MOU was being "ignored or lived up to in perfunctory, token fashion." The last meeting between the agencies on the MOU apparently was held in 1986.

4. Records indicate that ADEC sent a letter to the Forest Service in November 1983 "to initiate the process of implementing, in a straightforward, systematic fashion, the major provisions in the USFS/DEC MOU of 1980." ADEC has no records to indicate further significant interactions in regard to implementing the MOU, and there have been no such interactions during my tenure in this position, so far as I am aware.

5. Logging and roading in Alaska can have significant impacts on water quality. Without water quality monitoring data, it is very difficult for ADEC to determine whether state water quality standards are being met during forest management activities on National Forest lands. The Forest Service has primary responsibility to conduct such monitoring as a condition of the MOU. ADEC has no indication that such monitoring has taken place since the MOU was signed.

Date: Jan. 2, 1990

David C Sturdevant
David Sturdevant

Subscribed and sworn to before me this 2 day of [illegible], 19[illegible].

Notary Public, State of Alaska
My Commission Expires: ________

United Southeast Alaska Gillnetters

Resolution 90-02

Whereas: The fisheries industry is the largest non-government employer in the state of Alaska.

And
Whereas: USAG has determined that protection of fisheries habitat is of critical importance to the future of the fisheries industry and the general economy of the state of Alaska.

And
Whereas: USAG has determined that the timber industry is a valued industry to the state of Alaska, that has potential for a negative impact on the habitat necessary for the continued health of the salmon runs of the state of Alaska.

And
Whereas: Scientific research has determined that minimum standards for the harvest of timber near anadromous salmon streams and their tributaries can have maximum benefits to protecting the viability of the salmon populations.

And
Whereas: These standards have minimum impact on the harvest of timber and the health of the timber industry.

NOW THEREFOR BE IT RESOLVED:

USAG supports the adoption of the National Marine Fisheries Service standards for riparian zone manangement. These standards call for minimum 100' (30 meter) no cut buffers on Class I, II, and Class III streams that effect water quality in Class I or II streams.

BE IT FURTHER RESOLVED: That USAG endorses the UFA position of 24 roadless protection zones for salmon producing watersheds within the Tongass National Forest.

BE IT FURTHER RESOLVED: That the Salmon Bay watershed is of critical importance to the Southeast Gillnet fishing industry.

SOUTHEAST REGIONAL FISH & GAME COUNCIL
c/o ADF&G, DIVISION OF BOARDS, P.O. BOX 3-2000, JUNEAU, ALASKA 99802 PHONE: (907) 465-4110

February 15, 1990

ADVISORY COMMITTEES
Angoon
Craig
Edna Bay
Elfin Cove
Gastineau Channel
Hydaburg
Hyder
Icy Straits
Kake
Ketchikan
Klawock
Klukwan
Pelican
Petersburg
Port Alexander
Sitka
Sumner Straits
Tenakee
Upper Lynn Canal
Wrangell
Yakutat

The Honorable J. Bennett Johnston
Chairman
Committee on Energy and Natural Resources
United States Senate
SD-364 Dirksen Senate Office Building
Washington, D.C. 20510

Dear Senator Johnston:

The Southeast Regional Fish and Game Council (the Council) is composed of 21 local state fish and game advisory committees as established by Title VIII of ANILCA and Alaska Statutes Title 16 to advise and recommend management of fish and wildlife resources. The Council recently met in Juneau, February 7-9, 1990 and took the following action. Previously, the Council unanimously made the following recommendations:

1. 450 million annual timber harvest goal: The 45 million board foot annual timber harvest should not be mandated. The mandated figure causes management to compromise true multiple use goals such as fish and wildlife values, subsistence, recreational, and other resources uses. The Forest Service should make the annual cut reflect a combination of true industry needs, a comprehensive mix of market demand, environmental and other resource protection concerns. We recommend the Forest Service be directed to provide permanent habitat protection to sustain and enhance the present populations of fish and wildlife.

2. 50-year contract: The 50-year timber contracts should be renegotiated to reflect environmental concerns, updated silviculture information, mitigation for resources impacted by the timber harvest, and local economic needs.

3. $40 million annual appropriation: The $40 million Tongass Timber Supply Fund should be appropriated for multiple use planning, which includes funding for fisheries, habitat rehabilitation, recreational activities, fisheries enhancement, and pre-commercial thinning of second growth timber.

4. Land designations: The Council is not convinced wilderness designation is the best method of protecting high-value recreation, fish and wildlife habitats from logging. We favor legislated LUD II designation for 23 areas currently listed in legislation.

The Council during its February 7-9, 1990 meeting recommended the following amendments to our previous position by a 15-1-0 vote:

5. Buffer strips: The Council supports the National Marine Fisheries Policy on buffer strips which is a mandatory 100 foot no-cut minimum buffers on Class I, II, and important Class III streams and to support the protection of Salmon Bay as well as the other 23 key fish and wildlife retention areas.

The Council is compelled to participate in these very important issues through our recommendations as a means of carrying out our mandates to protect valuable fish, habitat, and wildlife resources for all the citizens of Southeast Alaska and indeed for the health of our whole state. Thank you for your attention to these matters. The Council and the individual advisory committees that comprise it stand ready to provide more information and assistance as called upon.

Sincerely,

Ann L. Lowe

Ann L. Lowe
Chairperson

City of Pelican

BOX 737 - PELICAN, ALASKA 99832 - PHONE 735-2202

RESOLUTION 1987-2

A RESOLUTION OF THE PELICAN CITY COUNCIL SUPPORTING LEGISLATION TO AMEND SECTION 705 OF ANILCA AND ADVOCATING PERMANENT WILDERNESS STATUS FOR THE LISIANSKI RIVER AREA

WHEREAS, the City of Pelican is a rural community primarily dependant upon fishing and tourism for its income; and,

WHEREAS, residents of Pelican depend heavily upon subsistance use of the fish and wildlife resources of the surrounding area, particularly the Lisianski River Area; and,

WHEREAS, the Tongas Timber Supply Fund and harvest goals of section 705 of ANILCA encourage excessive timber harvest and discourage responsible resource management by the U.S. Forest Service; and,

WHEREAS, excessive harvest of timber by clear cutting can adversly effect fishing tourism and subsistance use; and,

WHEREAS, the Alaska Pulp Company holds a 50 year contract authorizing excessive timber harvest with insufficient U.S. Forest Service control over the amount and area of cutting;

NOW THEREFORE BE IT RESOLVED THAT this governing body strongly supports H.R. 1516 and S.708, legislation amending sections 705(a) and 705(d) of the Alaska National Interest Lands Conservation Act;

BE IT FURTHER RESOLVED THAT this governing body strongly requests that Congress cancel or modify the 50 year contract with Alaska Pulp Company, and that the Lisianski River area (VCU's 249 and 262) be permanently protected as a small but critical addition to the West Chicagof Wilderness Area.

PASSED, APPROVED, AND ADOPTED BY THE PELICAN CITY COUNCIL THIS 8TH DAY OF MAY 1987.

signed:

Harry A Davidson
Harry A. Davidson, Mayor

Reuben M Yost
Reuben Yost, Councilmember

Mary Carson
Mary Carson, Councilmember

Vickie Bills
Vickie Bills, Councilmember

attest:

Edith M. Carlson
Edith M. Carlson, City Clerk/Treasurer

Charles A Peart
Charles A. Peart, Councilmember

Edward J Bunt
E.J. Bunt, Councilmember

City of Pelican

BOX 737 · PELICAN, ALASKA 99832 · PHONE 735-2202

The Honorable Bennett Johnston
Chairman, Energy and Resources Committee
United State Senate
Washington, D.C. 20510

FEBRUARY 21, 1990

Dear Senator Johnston:

On behalf of the Pelican City Council, I wish to inform you that Pelican does not support the recent changes in the Southeast Conference Tongass Policy Statement that are being presented to you at the upcoming hearing. Furthermore, we do not believe that these changes represent a consensus position reached through a legitimate process. We believe that these changes are the result of undue pressure by the timber industry on a newly elected SEC Board of Directors.

Pelican was very much involved in the original effort to develop a compromise position. Our past Mayor served on the Consensus Committee and we followed the evolution of the Policy Statement through many months of input and debate. While the final result was not perfect from our standpoint, it represented a bottom-line compromise we could live with. The new changes to the position are completely unacceptable to the City of Pelican; we have long maintained that protection of the Lisianski River corridor is essential. (See attached Resolution) A recent Municipal Public Opinion Survey confirmed that protection of the Lisianski River is of great importance. We had no input in the development on these changes; we learned of them seven days before they were accepted in spite of our vehement protest.

The original Tongass Policy Statement was an area-wide consensus effort. It has the support of the Governor because it was developed in a fair manner. The Southeast Conference has now chosen to represent a single business interest. For that reason we have withdrawn from the Southeast Conference. I urge you to consider our request to protect the Lisianski River from logging when you make amendments to S.346.

Sincerely yours,

Michael Todd Weaver

Michael Todd Weaver
Mayor City of Pelican

THE WILDERNESS SOCIETY

**STATEMENT OF JOSEPH R. MEHRKENS, EXECUTIVE DIRECTOR
THE SOUTHEAST ALASKA NATURAL RESOURCES CENTER,
ON THE PRELIMINARY FINDINGS OF THE TONGASS LAND MANAGEMENT
PLAN REVISION BEFORE THE HOUSE SUBCOMMITTEE ON
ENVIRONMENT, ENERGY, AND NATURAL RESOURCES
FEBRUARY 28, 1990.**

Mr. Chairman and members of the Committee, I am Joseph Mehrkens of the Southeast Alaska Natural Resources Center located in Juneau, Alaska. The Center, a joint project of The Wilderness Society and The Underhill Foundation, is dedicated to improving management of resources on the Tongass National Forest. One of our primary objectives is to insure that management reforms are incorporated into the revised Tongass forest plan. I am speaking here today for The Wilderness Society.

During the 14 years of my residency in Southeast Alaska, I was employed for 12 years by the U.S. Forest Service on the Tongass National Forest, first as a forest hydrologist and later as the head economist with the program planning and budget staff for the Alaska Region. My extensive experience with the planning process on the Tongass, including involvement with the original Tongass plan, gives me considerable understanding of the problems in the current Tongass plan revision.

The Forest Service has just released its Analysis of the Management Situation (AMS) for the Tongass National Forest. This document is supposed to describe the capabilities of the agency to resolve resource use conflicts and establish the bounds of planning alternatives. However, the AMS fails to achieve these objectives. It does not provide even basic documentation of how the information presented was derived and offers no factual basis by which the public can evaluate potential resource use conflicts. It does not discuss the most fundamental economic and environmental tradeoffs between competing resource uses. Most importantly, the AMS ignores the fact that management of the Tongass is driven by two 50-year, long-term timber sale contracts that require large, multimillion dollar subsidies each year. Compounding the inadequacies of the AMS, the Forest Service produced a slick, magazine style "user friendly" AMS that contains virtually no

1400 EYE STREET, N.W., WASHINGTON, D.C. 20005
(202) 842-3400

magazine style "user friendly" AMS that contains virtually no useful information, while its graphics and abstracts are highly misleading.

My statement addresses the major problems in the AMS, focusing specifically on how:

- the methods used to determine the value of timber do not reflect realistic future logging costs,
- important costs are excluded from the Tongass timber values,
- the lack of site specific timber resource information masks the uneconomic nature of the Tongass timber program, and
- the revised structure of the Tongass planning process makes it impossible to determine basic economic and environmental tradeoffs between timber and non-timber forest uses.

Tongass Timber Values Are Inflated

The most misleading information presented in the AMS is the discussion of the Tongass timber program. Even the results of the Forest Service's own Timber Sale Information Reporting System show that timber revenues from the Tongass fall far short of recovering the costs to prepare and administer timber sales.[1] However, the AMS indicates that current logging levels could be increased by up to 50 percent and still provide revenues in excess of costs. At the same time, the only way to increase logging substantially over current levels is to increase the use of uneconomic marginal timber lands. The AMS is simply a contradiction of facts and logic.

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[1] The AMS indicates that positive economic returns are achievable at logging rates that are 50 percent greater than the average rate from 1977 to 1989.

Forest Service methods of valuing Tongass timber[2] contradict conventional economic theory of supply. Normally timber owners would supply less timber when prices fall and more timber when prices rise. The data set used to develop the Tongass timber values show just the opposite relationship. For example, information supporting the AMS suggests that prices could fall as much as 60 percent, while the timber industry would harvest 50 percent more timber.[3]

Defenders of the Forest Service timber values are quick to point out that the values were developed using actual information collected from timber firms that have continued to operate even when the pond log values suggest that it should have been uneconomic to do so. In actuality, many timber operators were forced out of business during the last decade due to an inadequate profit margin.[4]

The remaining timber industry is dominated by the two pulp mills, which are heavily subsidized through long-term timber sale contracts.[5] Contract provisions have allowed the contract holders to pay substantially less than fair market prices for Tongass timber. On average, the long-term contract holders have paid about $40 per thousand board feet less than that paid by independent operators for short-term, competitive timber sales.

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[2] The Forest Service derives its values for Tongass timber by beginning with a figure called a pond log value. Pond log values are derived by subtracting a mill's manufacturing costs from the end-product selling values for pulp and lumber products. Under the Tongass method, pond log values over a 10 year period are ranked according to ascending value, regardless of chronological order. The volume of timber that corresponds with each pond log value is also recorded. Forest Service then compiles data starting with the volume for the lowest pond log value and adding the succeeding volumes until a volume equal to half the entire volume sold over the decade is reached. The pond log value that corresponds with the half way point in the volume, called the mid-market value, is accepted as the representative timber value for the decade.

[3] Due to the extreme volatility of Tongass timber prices, even a weighted average stumpage price based on timber volume cut would not be an appropriate value to evaluate the Tongass timber program. This can be seen in the pond log values from 1979 to 1988 which range from $67.80 to $422.32 per thousand board feet (in 1985 constant dollars). A plan based on average value does not represent these types of extreme fluctuations, which can be expected in the future.

[4] See USDA-Forest Service, 1986, Status of the Tongass National Forest, 1985 Report, Alaska Region, Administrative Document Number 153, Chapter 4, Status of the Tongass Small Business Timber Sales Program.

[5] In addition to the 100 small independent operators driven out of the Tongass timber business by the two long-term contract holders, the federal government has been short changed by the monopoly of the contract holders. Evidence in the Reid Brothers antitrust suit showed that the long-term contract holders used subterfuge in their recorded business transactions with the intent to prevent the Forest Service from increasing timber prices to a fair market value. The Forest Service has estimated the losses in federal timber receipts were $60 to $80 million dollars between the 1950s and 1975. The amount ultimately collected was less than $1 million dollars.

These differences are illustrated below in Table 1. This inequity results, in part, from the fact that the long-term stumpage prices are held constant for longer periods and are not influenced as much by improving markets conditions which raise the minimum advertised price for competitive timber sales.[6] In addition, the price that long-term contract holders are willing to pay is substantially less than the price the Forest Service used in coming to its conclusions in the AMS.

Table 1: ACTUAL STUMPAGE PRICES AND BID PREMIUMS -- $/mbf

	-- Long-Term Sales --		---- Competitive Sales ----		
	APC [1]	LPK [2]	Annual Average		
	(1)	(2)	(3)	(4)	(3)+(4)
Fiscal Year	Stumpage Price	Stumpage Price	Minimum Advertised Price	Competitive Bid Premium	Actual Selling Value
1986	1.48	2.12	2.51	19.21	21.79
1987	1.48	2.12	9.83	22.09	31.92
1988	1.47	2.12	24.09	38.60	62.68
(after 8/1)	--	45.19	---	---	---
1989	1.47	50.00	105.78	34.74	140.52

[1] Alaska Pulp Corporation.
[2] Louisiana Pacific-Ketchikan

While recent contract modifications have been made to periodically raise the stumpage rates for the long-term contracts, price increases for the contracts are not subject to competitive bidding. If they were, the willingness to pay for long-term timber would increase by another 35 to 50 percent.

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[6] This underscores a fundamental flaw in the Forest Service timber appraisal process for the Tongass National Forest. The appraisal process is underpinned by the assumption of free competition for national forest timber, which is not applicable to the Tongass due to the long-term timber sales.

The inequities between the long-term sales and competitive sales are well documented on the Tongass, but the AMS does not consider the effects of the long-term timber sales contracts. The document thus compares the value of non-timber forest resources against inflated timber values, due to the fact that the long-term timber sales are not included in the equation. Also ignored are the ecological and economic impacts to other resources as a result of logging under the long-term contract.

Tongass Timber Values Exclude Important Costs

Instead of including road costs in calculating the value of Tongass timber, the Forest Service handles these costs separately in the planning process,[7] supposedly because road costs vary from one geographic area to another. Nevertheless, the AMS estimates road costs from 1985 to 1987 and then applies them uniformly across the forest. The average road costs represent the first harvest entry into unroaded areas and reflect only the costs to access readily accessible timber. Forest Service studies indicate that logging and roading costs are expected to increase substantially during subsequent logging entries into a given area. Claims that future logging costs will be reduced because of the road system already in place ignore site specific studies that indicate that these cost savings will be offset by the greater costs in harvesting the less accessible timber. The AMS ignores this information and thus grossly overestimates the value of the timber program.

The AMS Lacks Site Specific Timber Resource Information

Forest Service planners and State of Alaska wildlife biologists recently uncovered major discrepancies between the Tongass timber type maps and actual on-the-ground conditions.[8] Rather than correct this problem, the Forest Service chose to aggregate site specific aspects of the timber resource into forest wide averages, thus further obscuring the actual range of conditions that affect the economic and ecological analyses used in forest planning. These non-specific aggregations are being used to estimate important factors--including species distribution, log grade, and size of timber--which strongly influence timber values. Unless this information is changed to reflect actual, site specific conditions, the agency will lack a system for accurately identifying these characteristics. If the information on economically important variables, such as volume class and log size, is unreliable, the economic analyses will be equally unreliable. This is particularly disturbing since the Forest Service often includes large amounts of marginal timber in the Tongass timber base, making it more difficult to differentiate timber values between marginal and more productive forest lands.

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[7] Since 1980, road construction and engineering costs have accounted for up to 60 percent of the annual Tongass timber program expenditures.

[8] In the summer of 1989, the Forest Service compared the forest inventory data gathered from 516 ground plots with the information predicted by existing timber type maps for the same locations. A "poor" correlation was found.

This practice will also exacerbate the existing problem of highgrading on the Tongass, a practice that is a major issue in current Tongass reform legislation. For the past 30 years, only the higher volume stands of timber on the Tongass have been harvested.[9] The AMS not only fails to address the issue but complicates it by claiming the forest is capable of sustaining an exaggerated level of logging. The AMS indicates that harvest rates of 580 to 780 million board feet (mmbf) are feasible for the 1990s, while the logging rate from 1977 to present has averaged 340 mmbf.[10] This proposed increase in logging reflects: 1) an excessive reliance on a special exemption from the National Forest Management Act that allows the inclusion of marginal timber lands in the timber base, 2) unreasonably high demand forecasts for Tongass timber, and 3) overly optimistic yields assumed for second-growth timber stands.

The exemption from Section 6(k) of the National Forest Management Act was intended to encourage the use of marginal timber. In practice, Tongass managers have used the exemption to inflate the timber base. While the timber base thus looks healthy, the timber industry has never selected the marginal timber,[11] even though the Forest Service has spent millions of dollars since 1980 to make this timber available. This has forced the agency to meet the requirements of the two long-term contracts by substituting better timber for unwanted marginal timber.

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[9] The timber industry has concentrated logging on the higher than average volume timber stands. The average volume per acre for the Tongass timber base is between 22,000 to 26,000 thousand board feet (mbf) per acre. Yet, harvest yields for the last 30 years have been about 40,000 to 42,000 mbf/acre. Since 1950, the most economically important species on the forest (Sitka spruce) accounts for about 27 percent of the total volume harvested. Its natural distribution over the timber base is only 11-16 percent. This means that the most profitable trees have been cut at a rate two timber faster than what can be sustained over the harvest rotation. The practice of concentrating on Sitka spruce and taking only the higher volume timber stands lowers the value of remaining timber supply.

[10] The period 1977 to 1989 includes two record high timber markets (1977 to 1981 and 1987 to 1989) and one severe timber market recession (1982 to 1986).

[11] Since 1980, there has actually been an increase in the average volume per acre harvested, even though the use of marginal lands was intended to more than double. Recent claims that significant marginal lands are now being used are the result of a 1985 change in the Forest Service definition of marginal timber. About half of the better timber lands originally designated in the Tongass Land Management Plan (TLMP) have been redefined as marginal.

Highgrading has severe impacts on critical on fish and wildlife habitat that is important to the well being of commercial fisherman, subsistence users, and sportsmen. Taking all the best timber now also jeopardizes the long-term economic future of the timber industry. By portraying marginal lands as feasible for harvest, even with massive public subsidies, the AMS presents a dangerously misleading picture.

The Forest Service recently spent more than $750,000 on the Alaska Timber Marketing Studies to collect data on the demand for Tongass timber in the Pacific Rim countries. The demand forecast for Tongass timber in these studies was 400 mmbf annually, an exaggerated amount in our opinion[12] but nevertheless far below the level proposed in the AMS of 580 mmbf to 780 mmbf per year.[13] While the AMS acknowledges no restraints for demand of Tongass timber, it does set demand cutoffs for all other forest resource industries such as commercial fishing and tourism.

Unrealistic assumptions concerning second-growth timber yields also affect the size of the Tongass timber base. Tongass planning assumes that second growth regenerated from most marginal old-growth timber lands will yield more timber than even the most productive stands of old growth. In some cases, the assumed yields for second growth are estimated to range from 400 to 600 percent more than the original old-growth stands.[14] While it is generally accepted that second-growth stands are more productive, the assumptions for the Tongass are completely unrealistic.

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[12] The Wilderness Society was invited by the Forest Service to serve on an oversight committee for the Alaska Timber Marketing Studies (ATMS). One of the principle responsibilities of the committee was to insure that the ATMS results would be specific to the conditions facing timber operators on the Tongass National Forest. The ATMS failed to meet this objective, partly because the studies were accelerated in response to anticipated congressional action on the Tongass Timber Reform Act. Rather than using new or primary information, the final ATMS report largely relied on information existing prior to the ATMS effort. This information was not specific to southeast Alaska. Thus, the final ATMS report is primarily a series of assumptions that justify the status quo of logging on the Tongass National Forest.

[13] The 400 mmbf forecast appears plausible only if the Alaska timber suppliers continue to respond to market forces as they have in the past. This assumes that the quality of Tongass timber will remain the same and ignores the fact that past logging has been concentrated in the areas of high volume, high quality old growth. Recognition that this practice cannot be sustained is well documented in a Forest Service memo to Congressman Young during the debate over the Alaska National Interest Lands and Conservation Act. The Forest Service stated that past levels of timber harvest could not be sustained without substantial use of lower volume, marginal timber stands. The average annual timber harvest yield from 1954 to today has been about 40 thousand board feet (mbf) per acre. Yet, the existing Tongass timber base averages only 26 mbf per acre for the first decade (1981-1990) and only 18 to 22 mbf acre over the next 60 years. Clearly, the preponderance of lower quality timber in the future timber supplies has major implications on the viability of the Tongass timber industry.

[14] According to Tongass planning assumptions, old-growth stands that yield only 14 mbf per acre (net sawlog basis) will yield 81 mbf per acre when cut again as a second-growth stands. The average yield for the highest and most productive old-growth timber (volume class 7) is 49.2 mbf per acre.

The manner in which the AMS handles the issue of second-growth productivity is deceptive. Problems of forecasting second-growth productivity may stem in part from the fact that the timber yield tables for second growth are largely based on a report published in 1930s, a report that did not emphasize regeneration of marginal timber lands.[15] The original report only evaluates two such areas. Yet, the Forest Service uses the projected increase in yields from second growth to be cut 100 years from now to justify logging more old growth today.

The Forest Service also fails to address the fact that the average quality of logs declines substantially in second-growth timber. Unlike old-growth timber characterized by wood that is fine grained, clear, and of superior strength, second-growth wood on the Tongass is coarse grained, knotty, and of inferior strength. Higher quality second-growth timber grown in the Pacific Northwest already competes with Alaska's old-growth. This means that Alaska's second-growth timber will probably be suitable only for pulp and represents a serious problem in that current pulp production in southeast Alaska is only possible because it is underwritten by the higher selling values of high quality lumber made from old growth.

AMS Is Unable to Present the Real Tradeoffs Between Resources

Fishing Seventeen years of research by the National Marine Fisheries Service (NMFS) has concluded that logging within 100 feet of salmon streams and their important tributaries irreparably harms the production of salmon. Yet, the Forest Service has failed to incorporate the minimum stream protections recommended by the Service into the AMS. This means that commercial fisheries will continue to be threatened by a taxpayer subsidized timber industry. Not only does the AMS fail to consider any tradeoffs between logging and fish production, it claims--without substantiation--that current logging could be increased by 130 percent without any adverse impacts to the Tongass fisheries. This defies not only two decades of scientific research and years of experience by commercial fishermen but common sense as well.

Subsistence Another notable deficiency in the AMS is the lack of serious consideration of subsistence uses. While the Forest Service provides information on the amount of wildlife habitat needed to maintain minimum viable wildlife populations, the agency does not provide information regarding how much habitat is needed to meet existing and future subsistence uses. Apparently, the Forest Service is choosing to ignore its statutory requirements to meet subsistence needs.

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[15] R.F. Taylor, 1934, Yield of second growth western hemlock-sitka spruce in southeastern alaska, USDA-Forest Service, Washington D.C., Tech. Bull. 412.

Conclusion

Mr. Chairman, the evidence shows that the AMS is a product of an entrenched bureaucracy that is choosing to obscure important issues rather than to resolve them. This document confirms the agency's bias towards the timber program, even though logging on the Tongass represents one of the most egregious below-cost timber programs in the nation and threatens the other valuable economic and ecological resources on the Tongass. While The Wilderness Society strongly supports the forest planning process and wants to work constructively with the Forest Service, we believe the AMS represents poor planning. Major corrections are needed in this document before the planning process can proceed. The plan must be made site specific, it must be based on accurate information, and it must respond to public needs. Taxpayers should not be expected to pay for poor planning and mismanagement of a valuable public resource.

I thank committee members for their interest in the Tongass planning process and urge you to begin correcting the many problems I have identified.

HAIDA CORPORATION

TESTIMONY OF BRUCE COOK, JR.
PRESIDENT, HAIDA CORPORATION

on Proposed Tongass Legislation
Before the Subcommittee on Public Lands,
National Parks and Forests
Committee on Energy and Natural Resources
United States Senate

February 26, 1990

I respectfully offer the following testimony on proposed Tongass legislation on behalf of Haida Corporation. Haida Corporation is the Native Village Corporation which was created pursuant to the Alaska Native Claims Settlement Act of 1971 for the village of Hydaburg, Alaska. Hydaburg is located on Prince of Wales Island in southern Southeast Alaska, in the heart of the Tongass National Forest.

We offer this testimony to draw the Committee's attention to Haida Corporation's land selection rights in the Tongass National Forest. We are deeply concerned that the commitment of the 99th Congress to Haida Corporation could be jeopardized by proposed legislation affecting the Tongass National Forest.

In 1986, after many years of effort by Haida Corporation to rectify its inequitable land selection rights under ANCSA which had left the corporation with virtually no choice in the lands it could select, Congress enacted P.L. 99-664, the Haida Land Exchange Act of 1986. That legislation was intended, among other things, to provide Haida Corporation with choices regarding future land selections, and "the opportunity to receive lands pursuant to this section [Section 10] which are economically valuable." (See p.15 H.Rept. 99-930). Section 10 of the Act provides that Federal lands in Alaska shall be made available for selection by Haida Corporation which meet the following factual criteria:

> Lands withdrawn pursuant to this subsection shall be, to the maximum extent possible, lands accessible from the coast which are of like kind and character to those traditionally used and occupied by the shareholders of Haida Corporation and shall be, to the maximum extent possible, capable of utilization for economic return to Haida Corporation.

Haida Corporation is entitled to select about 7900 acres under the authority of Section 10.

Almost all of Haida's ancestral lands which would meet the criteria quoted above were already committed to others (Native corporations, wilderness, timber contracts) at the time of enactment of the Haida Land Exchange Act of 1986. Some of these lands were among the best timber lands in Alaska. There are just three remaining areas which consist of traditional Haida lands and meet the criteria described above. The areas are Sulzer Portage, Nutkwa, and Karta, with Nutkwa and Karta containing over 90% of the acreage which meets the Section 10 criteria.

P.L. 99-664 provides that lands shall be withdrawn for Haida Corporation's selection under Section 10 in 1995. This date was chosen to permit the state of Alaska to complete its selections in the National Forest by 1994 and to coordinate with the Tongass Land Management Planning (TLMP) process. When this time frame was established, it was not anticipated that intervening legislation might be enacted which would (1) drastically reduce the pool of ancestral Haida lands potentially available for Haida Corporation's selection or (2) alter the Tongass Land Management Planning (TLMP) process. The Karta and Nutkwa areas are both designated as wilderness in the House-passed Tongass Reform Act (H.R. 987).

We request that the committee provide for the withdrawal of about 5800 acres of land in the Sulzer Portage area for Haida Corporation's selection. The withdrawal of these lands for this purpose has been agreed to by the State of Alaska and the Southeast Alaska Conservation Council (SEACC).

In this regard, we have attached for the record a proposed amendment, complete with a map and legal description of the Sulzer Portage lands recommended for withdrawal. The amendment contains two other provisions. The first is the designation of about 5000 acres of land near Hydaburg as a National Recreation Area. The lands were purchased in 1988 with funds from the Land and Water Conservation Fund. The other provision provides for the withdrawal of the subsurface estate of the Haida Traditional Use Sites, the surface estate of which is owned by Haida Corporation. The withdrawal is to address the management problems associated with a split estate and protect the traditional qualities of these lands.

In closing, Haida Corporation requests that any Tongass legislation approved by this committee confirm Haida Corporation's selection rights to "lands of value to Haida." According to the sponsors of the Haida legislation, these "Section 10" lands were to give Haida Corporation "a future." Haida Corporation's future will depend on these lands.

THE HAIDA AMENDMENT

To amend Public Law 99-664 to provide for the selection of certain lands in the State of Alaska, and for other purposes.

12. (a) WITHDRAWAL. -- The following lands are withdrawn, subject to valid existing rights from all forms of appropriation under the public land laws, including the mining and mineral leasing laws, and from selection under the Alaska Statehood Act, as amended:

LEGAL DESCRIPTION

(b) SELECTION. -- For a period of one year after the date of enactment of this Act, Haida Corporation shall be entitled to select lands from the lands withdrawn pursuant to this section. Haida Corporation shall notify the Secretary of the Interior which lands so withdrawn Haida Corporation wishes to select and shall designate which Haida Exchange Lands and/or outstanding selection rights under Section 16 of the Alaska Native Claims Settlement Act Haida Corporation intends to exchange or relinquish in return for its selections hereunder. After their selection, the surface estate in lands selected by Haida Corporation pursuant to this subsection shall be conveyed to Haida Corporation and the subsurface estate in such lands shall be conveyed to Sealaska Corporation in partial fulfillment of such corporations' entitlement under the Alaska Native Claims Settlement Act and pursuant to the provisions of that act, provided that the United

States shall reserve an easement 100 feet in total width for the use of the State of Alaska for a transportation corridor on the Sulzer Portage trail between Cholmondley Sound and Hetta Inlet, provided however, that timber occurring within the easement boundaries shall remain the property of Haida Corporation. The exchange of lands selected by Haida Corporation pursuant to this subsection for Haida Exchange Lands or selection rights under Section 16 of the Alaska Native Claims Settlement Act shall be on an acre-for-acre basis. The conveyance of lands to Haida Corporation and Sealaska Corporation pursuant to this subsection shall be deemed a conveyance of lands pursuant to the Alaska Native Claims Settlement Act.

(c) DURATION. -- The withdrawal made pursuant to subsection (a) shall terminate 90 days after the United States has conveyed the surface and subsurface estates of all lands selected by Haida Corporation pursuant to subsection (b) to Haida Corporation and Sealaska Corporation respectively, or one year after the date of enactment or this act, whichever is later.

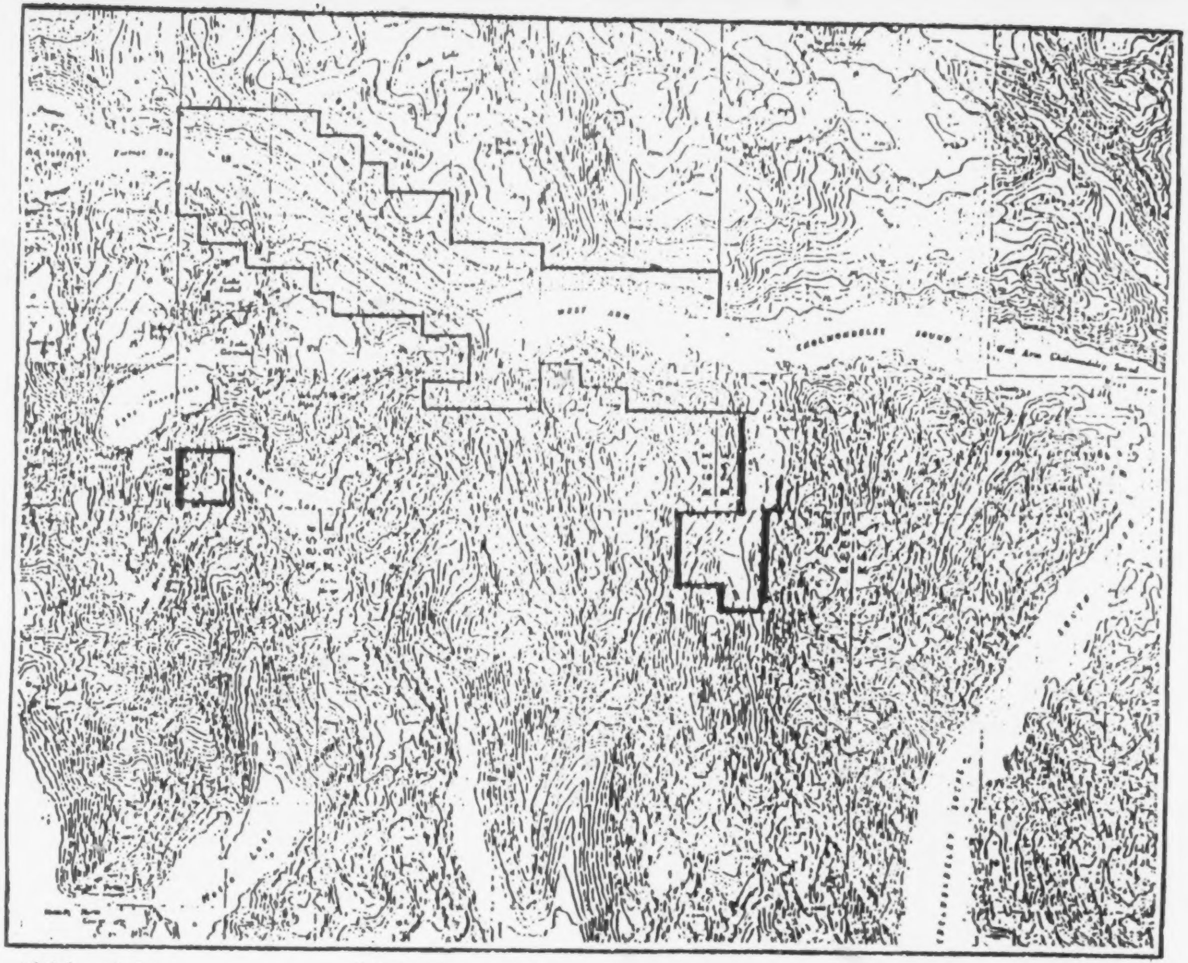
13. RECREATION AREA. -- There is hereby established within the Tongass National Forest the Hydaburg National Recreation Area, comprised of those lands described in Section 3(b). The Secretary of Agriculture shall administer the area in accordance with the laws, rules, and regulations applicable to the National Forest System and in order to provide for public outdoor recreational use.

14. TRADITIONAL USE SITE. -- The subsurface estate of those lands identified as the Haida Traditional Use Sites, the surface estate of which was conveyed to Haida Corporation in Interim Conveyance No. 1403, dated September 8, 1988, is hereby withdrawn subject to valid existing rights from all forms of entry and appropriation under the mining laws of the United States and from leasing under the mineral and geothermal leasing laws, provided however that the Secretary may make available to Haida Corporation any sand, gravel or other mineral materials in such lands as are subject to disposition pursuant to the Mining Materials Act of 1947.

HAIDA CORPORATION LAND SELECTION AMENDMENT

Sulzer Portage Withdrawal Area
Legal Description

Section	Copper River Meridian	Acres
	Township 76S, Range 85E	
16	S1/2S1/2, NW1/4SW1/4	200
17	W1/2, SE1/4, S1/2NE1/4	560
18	All, Fractional	510
19	N1/2NE1/4, SE1/4NE1/4, NE1/4NW1/4	160
20	N1/2, N1/2SE1/4, SE1/4SE1/4	440
21	All	640
22	S1/2, S1/2N1/2, Fractional	450
23	S1/2, Fractional	145
24	S1/2, Fractional	285
25	All, excluding islets	410
26	N1/2, N1/2SE1/4, Fractional	305
27	E1/2, E1/2W1/2, NW1/4NW1/4, SW1/4SW1/4	530
28	NE1/4NE1/4, SE1/4SE1/4	80
31	SW1/4, W1/2SE1/4	200
	Township 76S, Range 86E	
30	SW1/4, including all fractional lands on west shore of Big Creek Bay	135
	Township 76S, Range 86E	
31	E1/2W1/2, SW1/4SE1/4, NW1/4SE1/4	220
	Township 77S, Range 86E	
2	N1/2, SE1/4, N1/2SW1/4	560
	TOTAL ACRES	5,810


CHOLMONDELEY SOUND
West Arm Cholmondeley Sound

Withdrawal Area

HAIDA CORPORATION LAND SELECTION

Sulzer Portage Withdrawal Area

10-16-89
Total Acres 5810

CITY of YAKUTAT
P.O. Box 6
YAKUTAT, ALASKA 99689
(907) 784-3323

JOINT STATEMENT OF THE CITY OF YAKUTAT AND YAK-TAT KWAAN, INC. TO THE SENATE ENERGY AND NATURAL RESOURCES COMMITTEE

February 26, 1990

Yak-Tat Kwaan, Inc. ("YKI") is the corporation formed pursuant to the Alaska native Claims Settlement Act for the Village of Yakutat. Although today the Village is a First Class City under Alaska municipal law, most of the residents of the City are shareholders in YKI.

By letter dated October 11, 1989 to the Honorable J. Bennett Johnston, Chairman of the Energy and Natural Resources Committee, the City of Yakutat and Yak-Tat Kwaan, Inc. explained their joint position concerning the Yakutat Forelands. The City and YKI have refined their position further.

I. Previous Positions Which Have Not Changed

The previous positions of the City and YKI which have not changed are as follows:

1. Do not designate the area a wilderness area.
2. Prohibit commercial logging for 30 years. We believe our children should have the ability to decide their own future. Therefore, we think a legislative restriction on commercial logging for 30 years is sufficient for now.
3. Allow the use of the area for fishing, hunting, recreation, and tourism, including expansion of these activities.
4. Enhance the fish and wild life resources for commercial and subsistence use by the local community.

5. Set the boundaries of the area to be affected far enough back from the coastline of the ocean and Dry Bay so as not to affect the areas primarily used by commercial fishermen.

II. Further Refined Position As To Roads

Previously the City and YKI were opposed to all roads in the Yakutat Forelands so long as the coastal areas along the ocean and Dry Bay were excluded from the restrictions to be imposed on the Forelands. Now we realize that excluding roads for all purposes may hamper the use of the Forelands in the future for fishing, hunting, recreation and tourism. Therefore, if logging is excluded from the area whether or not roads will be built will be determined based on the value to fishing, hunting, recreation and tourism. In addition, if Congress prohibits roads, then some future administrator might close all motorized trails which are used now or could be used in the future.

Fishermen not only drive three and four-wheelers along the beach to support their commercial fishing, but they also use them to go along the Akwe River toward Akwe Lake, as well as other rivers and lakes. Hunters also use motorized boats to travel the rivers and motorized vehicles to travel trails throughout most of the area. Although most of the commercial fishing occurs near the ocean, the general fishing and hunting in the area supplies protein for the residents of Yakutat. These activities must be allowed to continue and expand as much as the fish and wildlife resources will allow.

III. The People In Yakutat Have Consistently Opposed a Wilderness Designation For The Yakutat Forelands

The people in Yakutat are opposed to and fearful of any additional wilderness areas around Yakutat. Yakutat is now surrounded by parks, preserves, and wilderness -- the Wrangell-St. Elias National Park and Preserve, Glacier Bay National Park and Preserve, and the Russell Fjord Wilderness Area. Only the Forelands are not now in a park or wilderness area. Initially we had hoped that parks, preserves, and wilderness areas would enhance the ability of Yakutat residents to make a living from fishing. Our experience to date has proved that we were mistaken. It seems that the regulation of Dry Bay is designed to discourage Yakutat fishermen. No more cabin permits are being given to commercial fishermen in the Dry Bay area. Therefore, practically all of the fishermen from Yakutat are required to build only temporary tents in an area out in the open on a spit where the wind can blow fiercely. The Park Service watches very closely how the fishermen live. For example, even the height and width of each tent is regulated to the inch. The tents have to be taken down each winter and the frames are destroyed by the winter weather because of the open, unprotected area. Each year the fishermen must spend the time and money to bring new material from Yakutat in order to remake their temporary camps. This expense could be reduced if the Park Service would allow the fishermen to leave their tents up in the winter. While the fishermen are confined to the windy spit, the Park Service required the commercial guides bringing raft trips down the Alsek River to set up their camps in an area where the fishermen traditionally picked strawberries. As a result, the strawberries are no longer available for the fishermen or their families. It is very difficult for the fishermen from Yakutat to have to struggle annually with the Park Service over the newest rules and regulations while trying to make a very modest living fishing. If the Yakutat Forelands east of the Dangerous River are subjected to these types of regulations where the primary thrust of the regulators is not to protect the commercial fishing or use of fish and wildlife for the local community, then one of the last primary areas for the residents of Yakutat will be taken from them.

The other primary area is the Situk drainage, which is in the Forelands east of the Dangerous River. Although the Situk drainage is not affected by the proposed legislation, the Situk drainage will probably be flooded within a few years so that it will be many years before it can again provide sustenance and a commercial base to Yakutat. When the Hubbard Glacier closes off Russell Fjord, Russell Fjord will flood out the Situk River, washing out parts of the forest, destroying fish spawning areas, and otherwise changing the Situk drainage in a dramatic way. When this happens, the residents of Yakutat who rely on the Situk drainage for their commercial fishing will have to look for other areas. As a result, the Yakutat Forelands from the Dangerous River to Dry Bay, will have to support the fishermen displaced by the flooding of the Situk drainage. The only limit which should be placed on this increased human demand for the resources in the Yakutat Forelands between the Dangerous River and Dry Bay should be the limits required to sustain and enhance the fish and wildlife of the area so they can provide a sustainable harvest for the residents of Yakutat.

IV Conclusion

Attached to this statement for your information are copies of the resolutions of YKI passed February 2, 1990 and the City passed February 20, 1990.

In conclusion, the City of Yakutat and Yak-Tat Kwaan, Inc. request that the Yakutat Forelands between the Dangerous River and Dry Bay:

1. Not be a wilderness area;

2. Not be used for commercial logging for 30 years;

3. Be used for fishing, hunting, recreation, and tourism;

4. Be used to enhance fish and wildlife resources for commercial and subsistence use by the local community;

5. Not include in the affected area the coastline areas of the ocean and Dry Bay used by commercial fishermen; and

6. Roads be allowed in the area.

Thank you for you consideration to the needs of the residents of Yakutat.

Larry Powell, Mayor
City of Yakutat

Lowell Petersen, President
Yak-Tat Kwaan, Inc.

cc: Senator Ted Stevens
Senator Frank Murkowski
Senator J. Bennett Johnston
Senator Timothy Wirth
Representative George Miller
Representative Don Young

YAK-TAT KWAAN INC.

RESOLUTION YKI 90-01

RESOLVED, that the President be and hereby is authorized to pursue a resolution of the proposed Yakutat Foreland Wilderness Area which would result in the following:

1. That the area not be designated a wilderness area;
2. That the area be useable for commercial and subsistence fishing, hunting, recreation, and tourism, including expansion of these activities in the future;
3. That there be no logging in the area;
4. That roads be allowed in the area;
5. That the restrictions applicable to the area not be permanent; and
6. That the President in consultation with fishermen from Yakutat draw boundary lines for the area which exclude areas of use by fishermen, including but not limited to the coastal areas along the ocean and Dry Bay.

I certify that the above resolution was passed at a duly called board meeting on February 2, 1990, and that it has not been modified or amended.

DATED this 26th day of February, 1990.

YAK-TAT KWAAN, INC.

Evelyn M Anderson

Evelyn M. Anderson, Secretary

YAK-TAT KWAAN, INC. • P.O. BOX 416 • YAKUTAT, ALASKA 99689 • 907-784-3335 or 784-3488

CITY OF YAKUTAT, ALASKA 99689
RESOLUTION 90-8

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF YAKUTAT MODIFYING THE CITY OF YAKUTAT'S POLICY STATEMENT FOR THE YAKUTAT FORELANDS.

WHEREAS; the Council has adopted basic policy recommendations for the Yakutat Forelands on March 8, 1988 and;

WHEREAS; the Yak-Tat Kwaan Corporation has adopted a resolution encompassing Forelands policy recommendations and;

WHEREAS; the two statements are essentially identical except for the question of road building and;

WHEREAS; it is in the community's best interest to have the City and the Yak-Tat Kwaan Inc. to be echoing a single position for pending Congressional action;

NOW THEREFORE BE IT RESOLVED; by the City Council for the City of Yakutat that the basic policy recommendations for the Forelands is modified to read as follows:

1. It is the policy of the City of Yakutat that fisheries values and fish habitat protection are of paramount importance on the Forelands, and first priority is assigned to the conservation of fish populations and habitat.

2. The Forelands should be managed for Fish and Wildlife, Subsistence, and Visual resources.

3. It is the policy of the City of Yakutat that commercial timber harvest and associated logging roads are prohibited east of the Dangerous River to the Alsek River.

4. Other roads will be allowed which are necessary to service established, as well as future, fishing, hunting, subsistence and tourism operations as they may develop.

5. It is the policy of the City of Yakutat that tourism is recognized as an industry with an important potential for growth which is compatible with the primary resource values and traditional use of the Forelands.

6. The management of the Situk River requires special attention and long term management planning agreed to earlier should be completed and implemented prior to the completion of the TLMP revision in 1989-90.

7. Although the community is specifically opposed to designation of additional "wilderness" on the Forelands, there is concern that the usual 10 year TLMP planning period is not sufficient protection for the items listed above. Therefore, it is recommended that the time frame for the land use designation ultimately given to those lands east of the Dangerous River transcend the usual TLMP planning period.

8. Officials from the City of Yakutat, Yak-Tat Kwaan Inc. and the Yakutat Fisheries organizations be instrumental in drawing boundary lines for any special management area designation on the Forelands.

PASSED AND APPROVED THIS DAY 20 OF February 1990.

Larry Powell
Mayor

ATTEST:

June Stockton
June Stockton
City Clerk

Kavilco
INCORPORATED

ONE UNION SQUARE SUITE [illegible]
600 UNIVERSITY STREET
SEATTLE, WASHINGTON 98101
[illegible]

January 16, 1990

Honorable Frank H. Murkowski, Senator
709 Senate Hart Building
Washington, D.C. 20510

RE: Karta Area Land Proposals in Tongass Legislation
VCU's 605, 606, 607, & 608

Dear Senator Murkowski:

As you know, the Kasaan Village is the nearest community to the Karta area. Kavilco (Kasaan Village Corporation) represents the bulk of the people of Kasaan and some of our land is located immediately adjacent to this area. Consequently, we have intimate knowledge of the Karta area and its resource values. We believe lands should be managed in a manner that will protect and enhance their value. At our board meeting on January 4 & 5, 1990, we reviewed various land proposals concerning the Karta area.

We first want you to know that the 39,881 acre non-timber harvest proposal that became part of the land package in the Southeast Conference "compromise" was not discussed with us and we do not support that proposal. That proposal does not consider all the resources of the area and consequently does not represent a balanced approach.

We have reviewed and support the attached compromise land allocation proposal. This proposal sets aside 15,253 acres of land as a buffer around Salmon Lake Karta Lake and the Karta River. We are confident that the Forest Service's normal management practices will allow timber harvest on the remaining 24,628 acres of the Karta watershed while protecting the fisheries and wildlife values in the McGilvery and Anderson Creek drainages.

Finally, we would like to keep open the option of a road across the East end of the Karta area to access our own lands as well as a future land link between Kasaan and the ferry terminal at Hollis.

Sincerely,

KAVILCO INCOPRORATED

Louis A. Thompson

Louis A. Thompson
President

LAT:lw

cc: Senator Ted Stevens
522 Senate Hart Building
Washington, D.C. 20510

Senator Bennett J. Johnston
136 Senate Hart Building
Washington, D.C. 20510

Mayor Ted Ferry, President
Southeast Conference
334 Front Street
Ketchikan, Alaska 99901

SOUTHEAST
ISLAND
SCHOOL
DISTRICT

1621 TONGASS AVENUE SUITE 301
POST OFFICE BOX 8340
KETCHIKAN, ALASKA 99901
(907) 225-9888 OR 225-9659

Robert Weinstein
SUPERINTENDENT

February 27, 1990

Senator Bennett Johnston
United States Senate
Washington, D. C. 20510

Dear Senator Johnston:

This letter is to address legislation regarding proposed changes in management of the Tongass National Forest, with specific emphasis on the involvement of the Southeast Conference in attempting to develop a "consensus" position representative of Southeast Alaska communities.

I am writing this letter not only due to recent events and the controversy over the Southeast Conference amending its position, but also to express concern over what had been deemed the original "compromise" adopted by the Southeast Conference last year which allegedly represented a consensus of Southeast communities . I did not write before now because I was reluctant to interject myself or the school district into a matter which, in my opinion, should have been dealt with directly by those at the highest levels of state government, as well as by members of Congress and appropriate federal agencies, rather than by an organization such as the Southeast Conference.

In my opinion, the proposal developed last year did not in fact represent a consensus of communities in Southeast Alaska regarding the legislation. While I am not aware of the inner workings of the Southeast Conference, I have been concerned about basic fairness and honesty since the adoption of the "compromise" last year and the touting by its proponents that it had undergone a rigorous process designed to gather input from communities in the Tongass regarding its possible effect upon those communities, and their inhabitants, livelihoods, and lifestyles.

The basis for my opinion is simple, and factual. I am superintendent of the Southeast Island School District, which is a regional school district operating in an area of about 20,000 square miles of what is known as the "unorganized borough" outside of large municipalities in the southern half of Southeast Alaska. The district operates schools in nineteen communities, and transports children from an additional community across the border to school in a larger adjacent Canadian community. Our communities are logging, fishing, and subsistence communities. Eleven have an economic base revolving largely around logging. Of all the governmental units (or any other organization) operating in this part of the state, I believe that we are uniquely situated to have a view of this issue from several perspectives, as opposed to only one.

I would like to note the following:

1. This district is comprised of most of the small communities in the southern half of the Tongass National Forest.

2. 50.5% of the Tongass National Forest is within school district boundaries. This is a greater percentage of Tongass National Forest land than that within the boundaries of any other Alaska governmental unit.

3. While some of the communities are organized as second class cities with limited powers, many are not. The school district is the only governmental unit with a presence in each of the communities, and is in fact the only organization- other than the state legislature itself- whose representatives are elected from these communities on a regional basis.

4. As we are comprised of logging, fishing, and subsistence users of the forest, this school district is in at least as good a position, if not in the best position, to see various positions on this issue, as opposed to a member of any industry group (whether it be timber or fishing), or a group or individual representing a particular position.

It has come to my attention that a few proponents of last year's position are claiming- often in emotional and personal terms- that the process last year was fair and somehow perfect because it was representative of the numerous communities in, and impacted by, the Tongass National Forest, while the process this year was unfair and one sided.

When stating the former, however, certain facts are not mentioned.

1. This school district was never contacted, even though we are comprised of the above communities, are one of the largest employers in the rural communities in southern Southeast Alaska (with approximately 200 employees), and have a communications network throughout the communities in the southern half of the Tongass National Forest. A reasonable person would conclude that we would have been contacted to see what the impact would be on employment, provision of educational programs to children throughout southern Southeast Alaska, and so on.

2. Members of our school board were never contacted. One, Estelle Thompson, is also the mayor of Kasaan, the only native Alaskan village in our district (which does not include the communities of Hydaburg, Craig, and Klawock due to their first class city status). Ms. Thompson's husband, Louis, is the president of Kavilco Corporation, the Kasaan village corporation established pursuant to the Alaska Native Land Claims Settlement Act. Mr. Thompson, in his capacity as Kavilco president, has recently publicly stated that he and Kavilco were never contacted. Ms. Thompson has advised me that the city of Kasaan was not contacted.

3. Most other communities in this district, including those organized as cities, were not contacted as part of the process last year as well. Again, I do not know if the leaders in last year's effort deliberately excluded the communities in our district because they were part of, and closely associated with, this district or not, but there is certainly an

appearance that this may have been the case. While some of the communities in which we operate schools center around logging operations of one of the large pulp mills and can accurately be described as temporary in nature, others (in addition to the cities and non-logging communities mentioned above) are long term and increasingly permanent in nature, with state land selections and incorporations as cities occurring with greater frequency.

While I have no problem with the Southeast Conference committee members making sure that persons and communities with strong views and positions were contacted and fairly represented, the concern I have is that those who either have not been vocal about their positions or were known to have a different position were not sought out for comment last year by the Southeast Conference committee members on an equal basis.

In conclusion, several things are evident:

1. The claims being made that last year's Southeast Conference process and position were fair and representative are simply not true. It is clear that a systematic effort to contact and get representative information from the appropriate communities within the boundaries of this school district did not occur. If anything, I would say that a systematic effort occurred to exclude our communities.

2. The one Alaska native village, and its village corporation, in this district were not contacted last year. It may be that a deliberate attempt was made by the Southeast Conference to exclude Alaska Natives at the local village level from its process.

3. The Southeast Conference is not necessarily an appropriate forum for achieving an Alaska position on this issue. Due to the complexity of the issue and the effect of the outcome on the entire region as well as the state as a whole, it seems that the Alaska position should have been forged through the offices of the Governor, with appropriate input from the Legislature, communities in the Tongass National Forest, and the

various industry and advocacy groups. This would have resulted in a process which would truly have been representative of the region, and we would not have what we do now: high emotions on the parts of many, including those who are defending what in reality appears to be the result of a flawed process designed to exclude communities and organizations with whom members of the Southeast Conference committee might have had some personal, political, or other differences.

Sincerely,

Bob Weinstein

Robert Weinstein
Superintendent

RW:hs

Pentec
ENVIRONMENTAL

March 2, 1990

Senate Energy and Natural Resources Committee
364 Dirksen Senate Office Building
Washington, D.C. 20510

Attention: Senator Bennett Johnston

State of Dr. James Brooks, NMFS
February 26, 1990 Hearing On Tongass National Forest

Dear Senator Johnston:

I have reviewed the statement of Dr. James Brooks that was presented to you on February 26, 1990, at the subcommittee hearing on the Tongass National Forest. The purpose of my review was to evaluate the effectiveness of the NMFS buffer policy for protection of fish habitat and to assess the factual nature of information, which Dr. Brooks states is the basis for this policy. I am a fisheries biologist with expertise in salmonid ecology and have significant experience concerning the effects of logging on fish habitat (see attached resume).

Dr. Brooks states "The NMFS policy advocates the use of a minimum 30-meter buffer on each side of all salmon streams and their tributaries as a recommended method of curtailing both short-term and long-term detrimental impacts on fish habitat from timber harvest" (paragraph 2, page 6). He also states "NMFS established the 30-meter minimum because buffers less than 30-meters will not adequately maintain fish habitat" (par 2, pg 6). Research by NMFS and others has demonstrated that buffer strips (no cut zones) riparian management zones (selective harvest zone), or both, are effective methods of protecting fish habitat. The size, type, and location of these habitat protection measures are dependent on stream size, channel geomorphic type, and the presence or absence of fish. For example, research has shown that the size of large woody debris (LWD) in streams is inversely related to stream size. The size of timber that should be retained along streams for LWD input can be specified to match the size requirement of the stream. A small stream does not require the largest trees for LWD dependent habitat. Also, smaller streams have less hydraulic capacity to erode their banks than a larger stream, thus channel stability can be maintained by smaller riparian trees and by a narrower strip of riparian timber than required along a larger stream.

120 West Dayton, Suite A7 • Edmonds, Washington 98020 • Telephone: (206) 775-4682 • Fax: (206) 778-9417

Streams which do not have anadromous fish and are tributary to anadromous fish streams do not require riparian retention measures equal to streams with anadromous fish. The objective of riparian management along non-fish streams is to protect water quality for downstream fish habitat. Research indicates that riparian timber retention methods and retention widths necessary to maintain habitat are dependent on the stream in question and that measures other than the NMFS policy can adequately maintain fish habitat.

Dr. Brooks indicated that streams need a continuous supply of LWD and that the level of LWD in a stream will be reduced to 70 percent over 90 years if timber is logged down to the streambanks (par 2, pg 4). Because of this, he states "Stream productivity would also be reduced during the period of regeneration and canopy closure. It is our opinion that, as a consequence, habitat and salmonid abundance would be significantly and irreparably damaged over this period of logging and recovery" (par 1, pg 5). This statement is misleading and untrue, given the current Forest Service riparian management policy and current knowledge. The Forest Service policy requires timber retention for LWD input, thus timber would not be completely cut to the streambank. Stream productivity can either increase or decrease after logging, depending on the degree of canopy opening and physical impacts to the channel. Forest Service guidelines are designed to promote the positive benefits and to prevent the negative consequences. Also, harvest units along a stream are logged on a staggered pattern and at different times to minimize potential negative impacts. Any impact that may occur to fish habitat and salmonid abundance is temporary and will recover. I am not aware of any research that demonstrates or proposes that impacts from logging are irreparable. Even the eruption of Mount St. Helens, which I investigated, did not cause irreparable damage. Habitat damages can be significant or catastrophic, but not irreparable. The Forest Service policy is designed to prevent logging from having significant or catastrophic impacts on fish habitat.

Dr. Brooks states "The NOAA policy would provide reliable protection of fish habitat during and after harvest" (par 2, pg 8). This I would agree with, but this or any policy is not a guarantee of habitat protection. Reliability of the NMFS policy is also dependent on application of additional measures needed to prevent catastrophic damages (e.g., landslides). The NMFS policy recognizes this and indicates that buffers wider than 30 meters may be needed in some situations (par 2, pg 6). But this requirement is contradictory to Dr. Brooks statement that "The policy is relatively simple to apply" (par 2, pg 8). If site specific information is needed to identify additional protective measures for hazardous areas and to identify the upstream boundaries of the 30-meter zone (see policy exceptions in par 5, pg 7), the NMFS policy is not as simple as it appears.

Dr. Brooks states "Protection of important anadromous streams would be far less compromised by lack of expertise, inadequate data," etc. (par 2, pg 8). This assumption is just the opposite of what could occur if the NMFS policy is adopted. Catastrophic damages to habitat are more likely to occur if experts are not employed and site specific data are not collected. Management by an interdisciplinary team of trained professionals is essential, regardless of which riparian management prescription is adopted.

Finally, Dr. Brooks states the NMFS policy would "provide an enforceable standard" and that the policy "should encourage compliance by managers and industry" (par 2, pg 8). If the NMFS policy includes site specific exceptions as indicated above, then quality control checks will require the same level of detail information required by the Forest Service. If the NMFS policy does not include site specific exceptions, then quality control checks will be easier. Although, the latter may encourage compliance, it may also encourage the taking of timber from areas with hazardous soils unless site specific plans are required and enforced.

The bottom line is resource management in a multiple-use forest is a complex task and requires trained professionals. The Forest Service recognizes this need and has designed a program to optimize production of all resources without compromising fish habitat and salmonid production.

Sincerely,
Pentec Environmental, Inc.
Douglas Martin /lml
Douglas J. Martin, Ph.D.

DJM/lml
Enclosure
cc: B. Norcross
D. Finney

Douglas J. Martin, Ph.D.

Senior Fisheries Biologist

Expertise

Project Management
Salmonid Ecology and Fisheries Biology
Fish Habitat Restoration and Enhancement

Dr. Martin has 15 years of experience in environmental consulting and management of environmental scientists. He has conducted baseline studies, monitoring programs, and environmental impact assessments for hydropower, oil, mining, and forestry projects in the Pacific Northwest and Alaska. Responsibilities have included coordinating with client and agency personnel, preparing permit applications, assembling and supervising multidisciplinary teams, planning and managing schedules and budgets, supervising subcontractor work, and editing technical reports. This work has provided environmental reports for federal, state, native, and industrial groups. Dr. Martin has prepared affidavits and provided expert testimony concerning a number of environmental issues.

Experience with Firm

Principal Investigator/Senior Biologist

- Dames & Moore (Exxon), Prince William Sound Salmon Studies, Prince William Sound, Alaska — Assessment of the effects of *Exxon Valdez* Oil Spill in Prince William Sound on: juvenile salmon habitat and prey resources in nearshore waters; water quality and toxicity to juvenile salmon; and, intertidal spawning habitat and habitat utilization by adult pink salmon.
- Forest Products Industry, Alaska — Technical representative for industry participation with agencies concerning research in fisheries and forestry for the purpose of improving management of Alaska timber and fisheries resources.

Other Experience

Senior Scientist, Dames & Moore, Seattle Office

Responsible for marketing and management of fisheries and environmental programs

- Forest Products Industry, Alaska — Provided technical input and proposed new guidelines for riparian management as a repesentative of a state advisory committee, which revised the Alaska Forest Practices Act.
- Wishbone Hill Coal Development Project, Palmer, Alaska — Supervised baseline survey of aquatic resources, including fish distribution and abundance, benthic invertebrate abundance, fish habitat, and water quality, for the purpose of preparing applications for project permits.

- NOAA/OCSEAP Research Project, Jakolof Bay, Alaska — Served as principal investigator of a multidisciplinary team studying the effects of petroleum contaminated waterways on spawning migrations of Pacific salmon. This research involved the coordination and integration of work products from hydrographic surveys, hydrocarbon analysis, numerical modeling, and fish tracking studies with biotelemetry.
- Army Corps of Engineers, Salmon Spawning Habitat Demonstration Project, Hanford, Washington — Manager of a pilot study for the Army Corps of Engineers to test the feasibility of providing alternative spawning habitats for chinook salmon in the Hanford Reach of the Columbia River. Conducted field investigations and developed conceptual design for spawning habitats that would function under a fluctuating flow regime.
- Environmental Assessment of Aquatic Impacts From Placer Mining in Alaska — Provided technical input and critical review for an assessment of the aquatic impacts of placer mining for the Bureau of Land Management.
- Port of Everett, Aquatic Habitat Mitigation Plan, Everett, Washington — Developed alternative mitigation plans to replace aquatic habitats lost as a result of dredging and port development.

Senior Scientist, Envirosphere Company, Bellevue, Washington

Responsible for the development and management of the fisheries and aquatic ecology program, as well as providing project management and technical expertise for environmental impacts and fisheries studies.

- NOAA/OCSEAP Research Project, Yukon River Delta, Alaska — Served as principal investigator for a two-year study of the distribution, seasonal abundance, and food habits of juvenile salmonids and nonsalmonid fish. Determined the nearshore migratory patterns of juvenile salmon and identified critical habitats that are vulnerable to oil and gas development on the outer continental shelf.
- Crooked River Habitat Improvement Project, Idaho — Manager of a field study for the USDA Forest Service to develop instream and riparian habitat restoration plans for several miles of stream impacted by placer mining.

- Yakima Indian Nation, Fish Entrainment Study, Washington — Managed a fisheries investigation on the Yakima River to determine the entrainment of juvenile salmonids in a hydropower/irrigation diversion canal during winter.
- Cumulative Impact Hydropower Development in the Columbia River — Co-project manager with Argonne National Laboratory project for the Northwest Power Planning Council to develop methods for assessing the cumulative impacts of hydroelectric development. This included an identification of all potential impacts on terrestrial and aquatic environments, an inventory of salmon and steelhead escapement data, and an evaluation of the spawner-recruit model as a means for assessing cumulative effects on fish.
- Northwest Power Planning Council, Salmonid Productivity Analysis, Washington — Provided technical input and critical review for an assessment of the existing and potential production of salmon in the Columbia River Basin. This information was used by the Council to develop the "Protected Areas Designation," which identifies streams in the Pacific Northwest where hydropower should not be developed because of environmental concerns.
- Susitna River Hydroelectric Project, Alaska — Conducted aquatic environmental impact assessments and developed fisheries monitoring plans for the proposed Susitna Hydro Project.
- Light Division, City of Tacoma, Environmental Impacts of Cushman PMF Project — Conducted initial environmental impact assessment for a reconnaissance and predesign level study of the Cushman Dam PMF Project.
- Seattle City Light, Impacts of Skagit Dams Project — Supervised an assessment of pre-dam fish production of resident and anadromous salmonids for stream habitat inundated by Ross, Diablo, and Gorge Reservoirs.

Independent Consultant, Seattle, Washington

Conducted environmental studies, developed management plans, and provided technical expertise for a variety of environmental projects.

- Puyallup River Tidal Marsh, Tacoma, Washington — Developed the conceptual design for a riverine tidal marsh on the Puyallup

River Delta. This habitat enhancement technique for juvenile salmonid habitat was subsequently constructed and now provides effective mitigation for habitat losses due to development at the Port of Tacoma.

- Washington Department of Natural ResourcesCumulative Effects of Forest Practices on the Environment, — Conducted a literature review, interviewed leading experts, and prepared a synthesis to define the scope and nature of possible cumulative effects of forest land management activities on fish populations and the aquatic environment.
- National Wildlife Federation versus the USDA Forest Service — Prepared an affidavit and provided expert testimony concerning the potential cumulative effects of landslides on salmon populations and habitat in the Pacific Northwest.
- Stream Habitat Inventory, Western Washington — Provided technical input for the development of methods for a stream habitat inventory for the Mt. Baker - Snoqualmie National Forest Fisheries Resource Assessment Program.
- Skagit River Instream Flow Studies, Washington — Performed field IFIM studies for the Fisheries Research Institute under contract with Seattle City Light.

Fisheries Biologist, Fisheries Research Institute, University of Washington, Seattle

Responsible for leading field research, preparing proposals, performing experimental studies, conducting data analysis, and preparing reports

- Mount St. Helens Fisheries Study, Southwest Washington — Conducted a two-year investigation of the impacts of the Mount St. Helens eruption on salmon populations and habitat of the Toutle River.
- Effects of Logging on Fish Production, Olympic Peninsula, Washington — Conducted a four-year investigation concerning the effects of streamside timber removal on fish production and habitat in small streams.
- Trident Submarine Base Dredging Study, Western Washington — Conducted static bioassays and avoidance behavior experiments to determine the effects of suspended sediment from dredging on juvenile salmon during outmigration through the nearshore environment.

Academic Background

Ph.D., Fisheries Science and Salmonid Ecology, College of Ocean and Fisheries Science, University of Washington, 1985

M.S., Fisheries Biology and Aquatic Ecology, College of Fisheries, University of Washington, 1976

B.S., Water Resource Management and Water Pollution Ecology, College of Natural Resources, University of Wisconsin, Stevens Point, 1971

Professional Affiliations

American Fisheries Society
American Institute of Fisheries Research Biologists

Selected Publications

Martin, D. J. 1989. Effects of petroleum contaminated waterways on migratory behavior of adult pink salmon. Pages 35-38. In: L. E. Jarvela and L. K. Thorsteinson (eds), proceedings of the Gulf of Alaska, Cook Inlet, and North Aleutian Basin Information Update Meeting, February 7-8, 1989, Anchorage, Alaska. National Oceanic and Atmospheric Administration.

Martin, D.J., T. Emery, and E. Stull. 1987. An inventory of catch and escapement data for Columbia River salmon and steelhead. Final report. Contract No. DEA179-48BP- 19461, Project No. 84-41, Bonneville Power Administration, Portland, OR.

Martin, D.J., C.S. Whitmus, L.E. Hachmeister, E.C. Volk, and S.L. Schroder. 1987. Distribution and seasonal abundance of juvenile salmon and other fishes in the Yukon River Delta. Final Report, Contract No. 50-ABNC-6-00016. National Oceanic and Atmospheric Administration, and Minerals Management Service, Anchorage, AK.

Martin, D.J., J.F. Orsborn, and T.W. Bumstead. 1987. A preliminary assessment of fish habitat improvement alternatives for the lower Crooked River. Final Report, Contract No. 53-0295-6-33. Forest Service, Nez Perce National Forest, Grangeville, ID.

Martin, D.J., L.J. Wasserman, and V.H. Dale. 1986. Influence of riparian vegetation on post-eruption survival of coho salmon fingerlings on the west side streams of Mount St. Helens, Washington. North American Journal of Fisheries Management. Vol. 6, No. 1, p. 1-8.

Martin, D.J. 1984. Growth, food consumption and production of cutthroat trout in relation to food supply and water temperature. Pages 135-145. In: J.M. Walton and D.B. Houston (eds.), proceedings of the Olympic Wild Fish Conference, March 23-25, 1983. Port Angeles, Washington.

Martin, D.J., E.O. Salo, S.T. White, J.A. June, W.A. Foris, and G.L. Lucchetti. 1981. The impact of managed streamside timber removal on cutthroat trout and the stream ecosystem, Part I - A Summary. University of Washington, Fisheries Research Institute, Rep. FRI-UW-8107, 65 pp.

Martin, D.J., E.O. Salo, and B.P. Snyder. 1977. Field bioassay studies on the tolerances of juvenile salmonids to various levels of suspended solids. University of Washington, Fisheries Research Institute, Rep. FRI-UW-7713. 35 pp.

Cederholm, C.J. and D.J. Martin. 1984. Habitat requirements of wild salmon and trout. In proceedings from: The Wild Salmon and Trout Conference, March 11-12, 1983. Seattle, Washington.

Thesis

Martin, D.J. 1985. Production of Cutthroat Trout (Salmo clarki) in relation to riparian vegetation in Bear Creek, Washington. Ph.D. Thesis, University of Washington. 134pp.

Martin, D.J. 1976. The effects of sediment and organic detritus on the production of benthic macroinvertebrates in four tributary streams of the Clearwater River, Washington. M.S. Thesis, University of Washington. 79 pp.

ALASKA MINERS ASSOCIATION, INC.
501 W. Northern Lights Blvd., Suite 203, Anchorage, AK 99503 (907) 276-0347

March 1, 1990

Honorable Frank Murkowski
United States Senate
709 Hart Building
Washington, DC 20510

RE: HR 987

Dear Senator Murkowski:

The Alaska Miners Association is opposed to the designation of any additional "Wilderness" in southeastern Alaska. The 1.8 million acres of new Wilderness proposed in HR 987 would result in a Wilderness classification for more than 50 percent of the land area of southeast Alaska. The legislation acknowledges fishing, recreation, timber and tourism as contributors to the economy of this region. It further acknowledges that the ability of these activities to contribute to the economy in the future depends on balanced planning and management of the Tongass, and yet, this legislation violates every tenet of balanced land planning and management. We further note that HR 987 does not recognize or acknowledge mining as a use of the forest.

The areas proposed for Wilderness designation in HR 987 include many geologic tracts of high to very high mineral potential. These areas include active mining districts and more specifically, active mining claims. It appears to us that no effort was made to recognize mining as a potential use of federal lands, in fact, one could argue that the selection of a number of the proposed areas appears to have been planned to squeeze out mining operations that are in advanced stages of exploration or that are under development at this time.

The mineral potential of many of the areas proposed for Wilderness is still relatively unknown. To illustrate this point we cite a just-released U.S. Geological Survey publication (MF-1970-B) within which the authors describe a belt of rocks that occurs within and parallel to the long axis of the West Duncan Canal proposed Wilderness. The government scientists predict that this belt of rocks has a 90% probability of containing two mines and a 50% probability of containing four mines. This recently identified potential would be extinguished by the proposed Wilderness classification.

ALASKA MINERS ASSOCIATION, INC.

Those proposed Wilderness areas that we feel deserve reconsideration and exclusion from HR 987 include:

1. Berners Bay - The purposed Wilderness area borders two active mine development projects and proposes a Wilderness designation for some of the most highly prospective mineral ground in southeastern Alaska. The proposed area also incorporates active patented mining claims.

The combination of the Berners Bay proposal and the Chuck River/Port Houghton/Sandborn Canal proposals would effectively remove from further exploration approximately 35% of the currently active goldbelt. The goldbelt is a geologic entity defined by structure and rock type within which geolgists are focusing their attention in hopes of finding additional mines on the scale of the Kensington, Alaska Juneau and/or Treadwell type. Companies active in this area include Echo Bay, Coeur d'Alene Mines, FMC Corporation, Hecla, Sealaska Corporation, Placer Dome, Curator American and a number of individuals.

2. Chuck River and Port Houghton/Sandborn Canal - The proposed Wilderness removes from exploration or development a large percentage of the goldbelt described under the Berners Bay comments and incorporates the former producing mines of Sumdum Chief and Point Ashley and the vein mines at Windham Bay. Our comment in reference to the Berners Bay area is also appropriate here, that is, that the combination of the Chuck River/Port Houghton area and the Berners Bay area would remove from exploration upwards of 35% of the most highly prospective mineral ground in southeast Alaska.

3. Point Adolphus/Mud Bay - The Point Adolphus/Mud Bay proposed Wilderness extinguishes the last potential in southeastern Alaska for discovery of a significant nickel, copper and/or platinum group metal deposit associated with the ultramafic rocks that occur within this area. The Wilderness areas that were established by ANILCA at West Chicagof/Yakobi and Glacier Bay covered the known prospects of this ore deposit type with the greatest potential for immediate development. The Point Adolphus proposed Wilderness area expands the Wilderness designated lands beyond that already in place and essentially eliminates any opportunity for exploration for and development of such strategic and critical mineral deposits.

4. West Duncan Canal - The West Duncan Canal proposed Wilderness incorporates rocks that have been described in the just-released U.S. Geological publication, cited earlier, within which government scientists believe that there is a 90% probability for the discovery of at least two mines and a 50% probability for the discovery of four mines. We believe the West Duncan Canal proposed Wilderness is a classic example of a political and/or emotional decision which cannot be supported by scientific fact.

5. South Kuiu - The South Kuiu Wilderness area is also discussed by government scientists in MF-1970-B. The authors of that report have identified a portion of the proposed Wilderness as highly prospective for mineral deposits and have ranked the mineral potential of that area at a "two" when measured on a scale of one to five where one is the highest possible potential.

6. Calder/Holbrook - The Calder/Holbrook Wilderness proposal incorporates at least seven known mineral deposits including one former operating mine, patented mining claims and active unpatented mining claims. The area was recently reviewed by government scientists (MF-1970-B) and was ranked as a "one", on a scale of one to five, as demonstrating potential for specific mineral deposit types.

7. Karta River - The purposed Karta River Wilderness area incorporates a large segment of the Hollis mining district, active mining claims and a past producing gold mine. The justification for this wilderness appears to be an effort to protect the fishery in the Karta River. However, this fishery can be adequately protected under existing law without the requirement for a blanket wilderness classification which not only incorporates the Karta River drainage but a considerable additional land area as well.

8. Kegan Lake - The designation of the Kegan Lake area as Wilderness ignores recent evidence and data made available from U.S. Bureau of Mines studies indicating a strong potential for rare earth element deposits in this and adjoining areas. The area, as nominated, also incorporates an historic mining district, patented mining claims and active unpatented claims. A U.S. Forest Service review of the resources of the Kegan Lake area concluded that the area has high potential for further mineral discovery and production.

9. Nutkwa - The purposed Wilderness area borders on the second most productive mining district in southeastern Alaska. Active exploration within the district has targeted rocks in the north half of the purposed Wilderness as potentially containing mineral deposits of a type similar to those that had previously been mined. The designation of this area as Wilderness would extinguish that potential.

We have identified for you nine of the twenty-three prospective "Wilderness" candidate areas that we believe should be excluded from "Wilderness" designation. This is not to say that we support a "Wilderness" designation for the remaining fourteen areas. Philosophically we feel "Wilderness" represents an admission on the part of society, in this case government, of its inability to intelligently manage our national resources.

ALASKA MINERS ASSOCIATION, INC.

ANILCA extinguished any opportunity for southeast Alaska to realize its maximum mineral potential. Those areas proposed for "Wilderness" in HR 987 will further erode that potential. Wilderness designation will adversely affect mineral development in four primary ways:

1) It will deny development of known deposits that have become part of the "Wilderness".
2) It will jeopardize mineral development in adjoining areas by making them uncompetitive due to higher costs for elevated "near Wilderness" environmental standards.
3) It will limit the long range potential of adjacent projects. Oftentimes the information developed in an operating mine will show that the orebody extends beyond the initial mine area. Extension of the mine would not be possible if there was adjacent Wilderness.
4) It will kill some projects due to insurmountable access problems and costs due to blocked access.

The Wilderness designation will directly and indirectly affect mining and all other development to include recreation, tourism, timber harvesting, fisheries enhancement, etc. We believe that this indirect or "fringe effect" is a factor that has not been adequately addressed in the evaluation of the impact on the economy of southeast Alaska that these "Wilderness" areas will precipitate.

If there is anything that we can do to assist you in making these points known to other members of Congress, their staffs, etc. please let us know. We are very concerned with the Tongass bills that are now under discussion and remain at your disposal to help explain the true effect that this legislation will have on the mining industry and the overall economy of southeastern Alaska and on the mineral supplies for our nation.

Sincerely,

Steven C Borell

Steven C. Borell, P.E.
Executive Director

cc: Senator Ted Stevens
Congressman Don Young

GY AND NATURAL RESOU
RECEIVED
FEB 27 1990
WASHINGTON, D.C. 20510

Senator Bennett Johnston
SH 136 Hart Senate Office Building
Washington D.C.20510-1802

Dear Senator Johnston,

The United Southeast Alaska Gillnetters just completed their winter Board of Directors meeting in Ketchikan,Alaska.We passed a motion to restate our position on the Tongass.We have signed several letters with other fishing groups and expressed our views to you before but feel it necessary to comment again at this time.

Since the S.E.Conferance chose to change their position and we feel they gave into the timber industry and did it in such a way no-one had a chance to have proper input in their decision,we feel S.E.Conferance lost all their creditibilty with the fisherman in S.E.Alaska.

As the time is rapidly coming to a close to comment on this issue,We again would like to say we demand at least 100'buffers on class I & II streams and III class streams when it affects water quility on I & IIs.

U.S.A.G.also endorses the United Fisherman of Alaska's position of the 24 roadless protection zones for salmon producing watersheds within the Tongass National Forest.We also would like to state that the Salmon Bay watershed is of critical importance to the Southeast Gillnet fishing industry.

We futher state that U.S.A.G. supports the adoption of the Forest Practices Act as introduced and that U.S.A.G. will not and cannot support any changes to this act as written.

Again we would like to thank you and the other Senators for your help in fighting for protection for our industry.

Sincerely,

Kay Andrew
United Southeast
Alaska Gillnetters
Timber Committee
P.O.Box 7211
Ketchikan,Alaska 99901

United Southeast Alaska's Gillnetters

policy statement

DRAFT DRAFT DRAFT

Resolution 90-01

Whereas: The fisheries industry is the largest non-government employer in the state of Alaska.

And

Whereas: USAG has determined that protection of fisheries habitat is of critical importance to the future of the fisheries industry and the general economy of the state of Alaska.

And

Whereas: USAG has determined that the timber industry is a valued industry to the state of Alaska, that has potential for a negative impact on the habitat necessary for the continued health of the salmon runs of the state of Alaska.

And

Whereas: Scientific research has determined that minimum standards for the harvest of timber near anadromous salmon streams and their tributaries can have maximum benefits to protecting the viability of the salmon populations.

And

Whereas: These standards have minimum impact on the harvest of timber and the health of the timber industry.

NOW THEREFOR BE IT RESOLVED:

USAG supports the adoption of the National Marine Fisheries Service standards for riparian zone manangement. These standards call for minimum 100' (30 meter) no cut buffers on Class I, II, and Class III streams that effect water quality in Class I or II streams.

BE IT FURTHER RESOLVED: That USAG endorses the UFA position of 24 roadless protection zones for salmon producing watersheds within the Tongass National Forest.

BE IT FURTHER RESOLVED: That the Salmon Bay watershed is of critical importance to the Southeast Gillnet fishing industry.

DRAFT DRAFT DRAFT

Resolution 90-02

Whereas: The fisheries industry is the largest non-government employer in the state of Alaska.

And
Whereas: USAG has determined that protection of fisheries habitat is of critical importance to the future of the fisheries industry and the general economy of the state of Alaska.

And
Whereas: USAG has determined that the timber industry is a valued industry to the state of Alaska, that has potential for a negative impact on the habitat necessary for the continued health of the salmon runs of the state of Alaska.

And
Whereas: Scientific research has determined that minimum standards for the harvest of timber near anadromous salmon streams and their tributaries can have maximum benefits to protecting the viability of the salmon populations.

And
Whereas: These standards have minimum impact on the harvest of timber and the health of the timber industry.
And
Whereas: The Forest Practices steering committee reached an agreed compromise on the Forest Practices Act now before the legislature.

NOW THEREFOR BE IT RESOLVED:

USAG supports the adoption of the Forest Practices Act as introduced.

BE IT FURTHER RESOLVED: That USAG will not and cannot support any changes to this act as written.

THE GARDEN CLUB OF AMERICA
598 MADISON AVENUE, NEW YORK, N.Y. 10022
TELEPHONE (212) 753-8287
FAX 212 753-0134
PRESIDENT
MRS. EDWARD A. BLACKBURN, JR.

NATIONAL AFFAIRS AND LEGISLATION COMMITTEE
CHAIRMAN
MRS. LEE F. DRISCOLL, JR.
[illegible] ROAD
AMBLER, PA 19002

March 2, 1990

The Honorable J. Bennett Johnston
United States Senate
136 Senate Hart Office Building
Washington, DC 20510

Dear Senator Bennett:

Thank you for your leadership in putting together meaningful Tongass reform legislation and your commitment for speedy committee mark up and passage.

Representatives of The Garden Club of America were at the hearing on the 26th and reported the good news to me.

We expect that your bill will have strong protection for critical fish and wildlife watersheds and good buffer zone language.

Sincerely,

Phoebe A. Driscoll
Chairman
National Affairs and Legislation Committee

bcc: Beth Norcross

THE WILDLIFE SOCIETY
5410 Grosvenor Lane • Bethesda, MD 20814 • Tel. (301) 897-9770

5 March 1990

The Honorable J. Bennett Johnston, Chairman
Subcommittee on Energy and Water Development
SD-132 Dirksen Senate Office Building
Washington, DC 20510

Dear Chairman Johnston:

The Wildlife Society urges you to support S.346, the Tongass Timber Reform Act. We particularly support permanent protection for important fish and wildlife habitat areas identified in S.346 by the protection of intact forested watersheds from logging. The Wildlife Society is a scientific and educational association of more than 8,700 wildlife researchers, managers, educators, and administrators working in the public and private sectors to promote wise stewardship of natural resources. The International office of The Wildlife Society fully supports the position of the Alaska Chapter as expressed in their letter of January 29, 1990 (see attached), and respects them as the experts on wildlife habitat requirements on Tongass National Forest. We also wish to submit to you The Wildlife Society's official position statement concerning old growth management and conservation, found in Conservation Policies of the Wildlife Society pp. 13-14, and a Wildlife Society white paper, "Management and conservation of old-growth forests in the United States", published in the Wildlife Society Bulletin,vol.16 no.2 pp.252-262.

Thank you for your efforts to win passage of the Tongass Timber Reform legislation, and for your continued support of S.346 during this session.

Sincerely,

Thomas M. Franklin

Thomas M. Franklin
Field Director

cc: Members, Subcommittee on Energy and Water Development

Attn: Beth Norcross

THE WILDLIFE SOCIETY
ALASKA CHAPTER
304 Lake Street
Sitka, Alaska 99835

FEB 6 1990

January 29, 1990

The Honorable Bennett Johnston
US Senate
Washington, D.C. 20510

Dear Senator Johnston,

The Alaska Chapter of the Wildlife Society represents professional wildlife biologists throughout the State of Alaska. We appreciate your ongoing efforts to win passage of Tongass Timber Reform legislation in the Senate, and we ask your continued support of S. 346 this session. We particularly support permanent protection for important fish and wildlife areas identified in S. 346, as well as provisions for minimum 100-foot buffer strips along Class 1 and 2 salmon streams.

Historically, the timber industry in Alaska has concentrated logging in the highest-volume old growth stands, typically at lower elevations along broad valley bottoms. These areas represent a relatively small percentage (about 4 %) of the Tongass in terms of land area, but they are vital to the continued abundance of deer, brown bears, eagles, marten and many other wildlife species in the region. Under current logging plans, Forest Service EIS's predict populations of these species will decline by 60 percent over large areas of the Tongass.

Ten years ago, when the original ANILCA compromise was crafted, legislators looked only at how many acres were in Wilderness, not at where those acres were located or what kind of habitat they represented. Most of the area now protected is in rock, ice, and scrub forest having little value to old-growth dependent wildlife. The Tongass Timber Reform Act can balance this inequity, at least in small measure, by protecting intact forested watersheds from logging. There will undoubtedly be pressure from the timber industry to substitute low quality acres for any high-quality old-growth acreage in the current proposal. We hope you will resist this pressure, recognizing that it would largely defeat the intent of the lands protection provisions.

Alaska is one of the very few places left where wildlife and fish provide an important source of protein to the inhabitants. The people of southeast Alaska depend on the Tongass National Forest to provide the old growth wildlife habitat that is essential to maintain the fish and wildlife populations needed for subsistence. The commercial fishing industry, guided hunting industry, and the tourism industry, also depend on the abundance of fish and wildlife that have been produced by the forest for centuries. These industries are threatened by the continued logging of prime fish and wildlife habitat.

We invite you to contact The Wildlife Society if you or your staff have any questions about wildlife/old growth relationships on the Tongass. Thank you again for your support on this important reform legislation.

Sincerely,

E L Young

E. L. Young
President, Alaska Chapter

cc: Honorable Timothy Wirth
Honorable Dale Bumpers
Tom Franklin, The Wildlife Society

HISTORIC
KETCHIKAN
ALASKA

334 FRONT STREET
KETCHIKAN, ALASKA 99901
907 225 3111

MAYOR TED FERRY
CITY OF KETCHIKAN

FTR

MAR 08 1990

March 1, 1990

Honorable Senator J. Bennett Johnston
Chairman - Senate Energy and Natural Resource Committee
United States Senate
Washington D. C. * 20510

Dear Senator Johnston:

To correct any perceived misconception, put forth by some organizations, on whether the citizens of Ketchikan support the recent revisions of the Southeast Conference Policy Statement on the Tongass - I must respond.

As a 65 year resident of Southeast Alaska, and over 30 years involved in an elected or appointed political office (4½ as Mayor), I know that a vast majority of people in our community support the recent revisions.

The Southeast Conference received over 680 letters, petition names, etc. of support. An additional 110 responses were not in support. This surely suggests a large majority are against any more "wilderness", and support the revisions.

Great concern was expressed by four "Alaska-Native" organizations that would be denied access to their lands.

I've yet to learn who made the maps following board meeting in March 1989, certainly not the "board of directors".

Thank you once more for the extended interest you have shown. Mr. Dick Griffin reported on the excellent questions asked, and courtesy shown to him at the February 26th hearing.

Respectfully,

Ted Ferry

Ted Ferry
Mayor

TF:rf

TO: SEC BOARD
FROM: J. KOHLER
DATE: 2/2/90
SUBJ: SUMMARY/ORGANIZATION OF RESPONSE PACKETS

I HAVE ORGANIZED WRITTEN RESPONSES RECEIVED BY THE SEC OFFICE THROUGH 5:00 PM, THURSDAY, FEBRUARY 1, 1990 INTO THREE (3) CATEGORIES:

1. MUNICIPALITIES, ORGANIZATIONS AND ASSOCIATIONS
2. INDIVIDUALS (INDIVIDUALIZED, SEPARATELY SUBMITTED)
3. INDIVIDUALS (PETITIONS, PREPRINTED RESPONSES, ETC.)

I HAVE ALSO PREPARED COPIES OF CATEGORIES 1 AND 2 FOR YOUR PACKETS TO FACILITATE YOUR REVIEW. I HAVE NOT MADE COPIES OF CATEGORY 3 BUT HAVE PREPARED A BRIEF SUMMARY OF NUMBER OF INDIVIDUALS REPRESENTED AND THEIR BREAK-OUT FOR OR AGAINST RECOMMENDED/PROPOSED CHANGES.

THIS CATEGORIZATION IS BY NO MEANS UNFLAWED. I OFFER IT ONLY AS AN ATTEMPT TO PUT SOME ORDER OF THE MATERIAL TO MAKE YOUR OWN REVIEW A LITTLE EASIER.

Petition Presented to
Board - 1-23-90

24 Residents
Naukati Community

66 Residents

Port Protection La Bouchene Bay - Point Baker

Support proposed Revision
(Alder/Holbrook

TOTAL 90

Petition with proposal to
SEC board of directors 1-23-90

2-2-90

	FOR	{Revision}	Against
TOTALS	577		108

682

Feb 2nd}
577 - 2/2/90
90 - Petition
ORIGINAL
103 Follow up. #3
682

SUMMARY OF RESPONSES

FOR

CATEGORY 1: MUNICIPALITIES, ORGANIZATIONS & ASSOCIATIONS (33)

- ANNETTE ISLAND (METLAKATLA)
- SE ALASKA CAB CO.
- R.M. ENGINEERING
- ALASKA APPRAISAL ASSOCIATES
- TUBS CONSTRUCTION
- HOGAN MECHAM RICHARDSON CO.
- CRUISE LINES AGENCIES
- SHELDAM & MILNER CPA
- COOKE CABLEVISION
- WRANGELL FOREST PRODUCTS INC
- INTL LONGSHOREMEN & WHSE UNION LOCAL 87
- AK LONGSHORE EMPLOYERS' ASSN.
- DIVERSIFIED INVESTMENTS INC
- AK. MARITIME AGENCIES INC
- LESLIE CUTTING INC
- WILLIAM BROCK ASSOCIATES
- GOLDBELT
- CITY OF WRANGELL
- KETCHIKAN BOWLING CENTER
- GREAT ALASKA CEDAR WORKS
- WRANGELL STEVEDORING
- DON'S BUSINESS SUPPLIES
- REVILLA TUG COMPANY
- AMAK TOWING COMPANY, INC.
- IBEW LOCAL 1547
- U.P.I.U. 1341
- ALASKA LONGSHORE EMPLOYEES ASS
- ILWU LOCAL 200
- SE STEVEDORING CORP.
- PORTER/SPAULDING INC.
- INTL UNION OPERATING ENGINEERS
- SOUTHCOAST INC.
- KLUKWAN FOREST PRODUCTS

CATEGORY 2: INDIVIDUALS (INDIVIDUALIZED, SEPARATELY SUBMITTED) 57 (10)

CATEGORY 3: INDIVIDUALS (PETITIONS, PRE-PRINTED RESPONSES, ETC.) (~~45~~
397

- NO COPIES ATTACHED

487
90 ORIGINAL PETITION
105 letters Followed
682
682

SUMMARY OF RESPONSES
AGAINST

CATEGORY 1: MUNICIPALITIES, ORGANIZATIONS / ASSOCIATIONS = [redacted] (17)

- CITY OF TENAKEE SPRINGS
- CITY OF THORNE BAY
- CITY OF CRAIG
- POINT BAKER COMM. ASSOCIATION
- SALMON BAY PROTECTIVE ASSOC.
- SITKA FISH/GAME ADVISORY COMM
- CHUCK RIVER LANDOWNERS ASSOC.
- ALASKA TROLLERS ASSOC.
- UNITED FISHERMEN OF ALASKA
- CITY OF PORT ALEXANDER
- CITY OF PELICAN
- CITY OF PETERSBURG
- UNITED S.E.A. GILLNETTERS
- SE ALASKA NATURAL RESOURCE CENTER
- ELFIN COVE NON-PROFIT ASSOC.
- SUMNER STRAIT FISH/GAME ADVISORY
- SOUTHERN SE REGIONAL AQUACULTURE

CATEGORY 2: INDIVIDUALS (INDIVIDUALIZED, SEPARATELY SUBMITTED) (16)

- RALPH C. GREGORY
- FLORIAN SEVER
- PATTY KIRCHHOFF
- ROBERT FAGEN
- FRAN ULMER
- ERIC KING
- REBECCA KNIGHT
- KAREN HOFSTAD
- ROBERT LARSON
- LUCILLE MERRILL
- DAVE PALMER
- PETER GOLL
- DAVID M^c FADDEN
- PAULA DOWNS
- ANNETTE ANDERSON
- MURPHY FORNER

178

CATEGORY 3: INDIVIDUALS (PETITIONS, PRE-PRINTED RESPONSES, ETC) (75)

- NO COPIES ATTACHED

108
03
111

TESTIMONY FOR SENATE HEARING — TONGASS REFORM ACT

(S-346/ HR 987)

(Deadline To Be Included In The Official Record March 1, 1990)

Honorable Bennett Johnston
U. S. Senate
Washington, D. C. 20510

Dear Senator Johnston:

Please make note of my position on the Tongass Reform Act and then forward my testimony in time so that it is counted in the official record of the hearing process for the Tongass Reform Act, S-346/HR-987. Please forward to:

Senator Dale Bumpers, Chairman
Public Lands, National Parks and Forests Subcommittee
Senate Energy and Natural Resources Committee
SD-308 Dirksen Senate Office Building
Washington, DC 20510

TESTIMONY S-346/HR-987

RGY AND NATURAL RESOU
RECEIVED
MAR 05 1990
20510

Dear Senator Bumpers:

I wish it known to Congress that I **support** the concept of Tongass Community Alternative, S-237, authored by Senator Frank Murkowski. It favors the retention of community, economic and multiple-use goals. Please consider this testimony as my personal testimony on the proposed Tongass Reform Act (S-346/HR-987). Please include it in the official record of the hearing planned for February 26, 1990. Should for any reason the hearing be postponed or cancelled, please include my testimony in the official record for S-346/HR-987.

The Tongass National Forest is extremely important to us. The pending legislation (S-346 / HR-987) sets a precedent that will guide National Forest management and multiple-use in 155 other National Forests across America. We are concerned that decisions made on the Tongass may damage the economy of Southeast Alaska, but will also set future public policy for all National Forests without citizens in those forests having an opportunity to testify or provide public comment.

Although I have used this questionnaire for convenience, I may make changes, additions, or enclose statements and I would like those included in the official public record. Thank you.

PUBLIC RESPONSE **Agree or Disagree** (Please check one.)

1. I **support** the concept of the Tongass Community Alternative, S-237, authored by Senator Frank Murkowski. It favors the retention of community, economic and multiple-use goals. Congress should not rush to judgment on this issue.

Agree ☑ Disagree ☐

2. I oppose S-346 and HR-987, known as the Tongass Reform Act, for the reasons outlined in the following questions.

Agree ☑ Disagree ☐

Forest Plans

3. New information in the Tongass National Land Management Plan, due out in late Spring 1990, should be considered before Congress votes on S-346/HR-987. It will set a dangerous precedent if Congress ignores the millions of dollars and thousands of man-hours and public comments already invested in the Tongass Forest Plan.

Agree ☑ Disagree ☐

4. If Congress votes prior to the release of the Tongass Forest Plan, it will violate the process Congress set up and destroy public confidence in the Forest Planning Process passed by Congress in the National Forest Management Act. Why should I, or any other person concerned about the future of our national forests, bother to participate in the Forest Planning Process when Congress seems to be willing to ignore all my work and that of my neighbors?

Agree ☑ Disagree ☐

MORE →→

Pag 2

Buffer Zones • Harvest Levels

5. Buffer zones along streams and waterways to protect views, fisheries, and wildlife habitat are considered important. However, I feel regulations concerning buffer zones are already in the Forest Management Plans and alternatives and site specific management should be left to the professional resource managers. There may be cases where 100-ft buffer zones are not enough and others where they may be too much or not necessary. We should let professional resource managers decide.

Agree ☑ **Disagree** ☐

6. Only 10% of the Tongass National Forest can ever be harvested. Only 30% of the commercial timber on the Tongass can ever be cut, and that is over a 100 year cycle. With 70% of the Tongass' commercial forest off-limits to logging, I believe the Tongass has enough Wilderness and that Congress should not take any additional land out of the timber base that supports one third of the entire economy of Southeast Alaska.

Agree ☑ **Disagree** ☐

7. The whole national timber industry is in jeopardy because of lawsuits against the Forest Service and Bureau of Land Management. Congress should support existing laws where harvest goals are set and pass new laws to guarantee a minimum harvest level in each forest so that the mills, the families that are supported by them and the communities that are dependent on them can survive.

Agree ☑ **Disagree** ☐

Wilderness

8. The Tongass National Forest is 1/3 wilderness. Congress should do a regional economic impact analysis of each Wilderness proposal (in the Tongass and elsewhere) prior to passage to consider whether the additional Wilderness will damage the social and economic balance in the affected area. No Wilderness Bill should pass Congress without this regional economic impact analysis. I support Federal funding to compensate individuals, communities and businesses that are injured because federal wilderness additions jeopardize a region's existing economic infrastructure.

Agree ☑ **Disagree** ☐

Contracts

9. I support the Tongass' long-term timber contracts, which were bid competitively and which helped build and diversify a regional economy. In the Tongass, because most of the timber supply is on federal lands, there is no other way to guarantee private enterprise a sufficient timber supply large enough to justify the huge investment required to set up operations in this area. How will any person or company doing business with the Forest Service or U. S. Government have the confidence to make large investments if Congress can simply cancel those contracts?

Agree ☑ **Disagree** ☐

10. Where Congress terminates resource contracts, the government should be forced to pay compensation to the local communities for losses sustained by individuals who made investments in homes and farms as well as losses by business and local governments—all who based their futures on those contracts and the continuation of those resource industries.

Agree ☑ **Disagree** ☐

11. Additional Comments ____mark here if enclosure(s) included:

Fill in below to validate your testimony:

Signature ______ Print Name Thyes Shaub

Address PO Box 32517

Town Juneau State AK Zip 99803

Fill in below if this testimony is on behalf of an association or other group:

Name of Group/Company ______________________

Number of Members/Employees ______________

Please include this testimony in the official record of the Tongass Reform Act.